

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

FOR THE PERIOD 1 AUGUST 2024 TO 31 JULY 2025

The University of Keele is committed to protecting and respecting human rights and have a zero-tolerance approach to slavery and human trafficking in all its forms. This statement is made pursuant to [Section 54, Part 6 of the Modern Slavery Act 2015](#) and constitutes the University of Keele's slavery and human trafficking statement for the financial year beginning 1 August 2024 and ending 31 July 2025. It sets out the steps the University has taken across our research, teaching, and operational activities in relation to slavery and human trafficking in our supply chains and within our own organisation.

## 1. Our Commitment

- 1.1 The [University's Strategic Plan](#) sets out our mission to making a difference in society by providing innovative, high-quality education for students from all backgrounds and by undertaking world-leading research that transforms understanding and brings benefit to society, communities and individuals. A key focus of the Strategy is Social and Civic Responsibility, ensuring that we have a clear sense of purpose and knowledge of what our performance needs to be to achieve this. Keele University has a strong sense of community, and we recognise how our place in the UK partly defines us and what we do but that brings with it a determination to be global in outlook and international in action. Ultimately, our success comes from our people and the partnerships we forge, nurture, and cherish.
- 1.2 Modern slavery is a crime and a violation of fundamental human rights under the Modern Slavery Act 2015. We recognise that modern slavery is a significant global human rights issue that includes human trafficking, sexual exploitation, forced and bonded labour, domestic servitude, and some forms of child labour, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.
- 1.3 The University of Keele (including all group companies) operates under a zero-tolerance approach to modern slavery, and our commitment starts from protecting and respecting human rights and taking action to prevent slavery and human trafficking in all its forms. We are committed to acting ethically and with integrity in all our relationships, and using all reasonable endeavours to implement meaningful and effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We recognise we have a responsibility to raise awareness of modern slavery by researching teaching and engaging staff and students on this issue.
- 1.4 The University is an accredited Living Wage employer. In addition to paying all our own staff a minimum of the Living Wage accreditation also requires us to ensure that any contractor's employees working on our premises for a specified period are also paid a minimum of the Living Wage.
- 1.5 The University is committed to a high level of corporate governance. The University, like other public bodies, has a duty to conduct its affairs in a responsible and transparent way, and to consider the requirements of its funding bodies and the Higher Education Code of Governance published by the Committee of University Chairs (CUC).

- 1.6** The University also conducts its business in accordance with the seven principles identified by the Committee on Standards in Public Life (selflessness, integrity, objectivity, accountability, openness, honesty, and leadership). The CUC Code was revised and published in September 2020 and the University is fully compliant. The CUC published a Higher Education Audit Committees Code of Practice in May 2020, which identified the key principles and elements that form an effective Audit Committee. The Council has formally adopted the Code.
- 1.7** The University is also committed to the principles of academic freedom and equality of opportunity in its approach to governance. We are also committed to protecting and respecting human rights by ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers, and other business partners, and as part of our contracting processes, in the coming year we will continue to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

## **2. Organisational Structure & Activities**

- 2.1** The University of Keele is an independent corporation and is the successor to the University College of North Staffordshire, founded in 1949. The University derives its legal status from the Royal Charter granted in 1962 (as subsequently amended) and the status of its degrees is recognised by the University of Keele Act 1962. Like many English universities, the University is a charity exempt from registration with the Charity Commission and the Office for Students (OfS) is the principal charity regulator for the University. This means that members of the Council have the responsibilities of charity trustees in relation to ensuring the institution's work is for the public benefit and that it complies with Charity Commission expectations. An internal review of the University's compliance with charity law requirements in 2021 resulted in the Council being provided with a high level of assurance.
- 2.2** The Council is the supreme governing body of the University. It has a collective responsibility to promote the University's well-being and for the proper management and financial solvency of the institution. Major policy decisions, as well as corporate strategy, are also subject to its approval. The Council has a majority of lay members (neither employees nor students at the University) and includes among its members representatives of staff and students. The Vice-Chancellor has general responsibility to the Council for maintaining and promoting the efficiency and good order of the University.
- 2.3** The University Executive Committee (UEC) is the primary executive committee of the University and acts as an advisory committee to the Vice-Chancellor in leading the strategic direction of the University. Membership of UEC comprises of the Vice-Chancellor (chair); the Deputy Vice-Chancellor and Provost; the Chief Operating Officer; Pro Vice-Chancellors; Executive Deans of the Faculties; and Directors (or equivalent) of the professional service functions.
- 2.4** The University is a provider of teaching, research, and enterprise in the higher education sector. Our founding ethos remains at the core of the University's mission to make a difference in society by providing innovative, high-quality education for students from all backgrounds. Building on the University's founding principles, our commitment to promoting equality and valuing diversity is at the centre of our efforts to ensure that all staff and students can flourish and fulfil their potential. Our quality teaching and cutting-edge research is being used to improve the lives of people and

address the most pressing challenges across our region, and the entire world.

- 2.5** The University procures a wide range of goods and services, in accordance with public procurement law and our Responsible Procurement Strategy 2022-2027. These include construction services and supplies, furniture and stationery, electronics (computers, audio visual equipment, phones etc.), food and catering supplies, travel services, laboratory supplies (small and large equipment, chemicals, consumables, pharmaceuticals etc.), books and printing and waste management services. A large proportion of our spend is through frameworks established by collaborative consortia, particularly the North Western Universities Purchasing Consortium (NWUPC), the Crown Commercial Service (CCS) and the University Caterers Organisation (TUCO). The University has a global annual turnover of circa £213.4 million including VAT and our procurement spend (non-pay) over the 2024/25 financial year was approximately £81.8 million including VAT, with thousands of unique suppliers; is one of the largest campus universities in the UK with the most important facilities located together at the centre of campus, which at around 600 acres is one of the biggest in the UK and is home to approximately 15,000 students.
- 2.6** The University is dedicated to exhibiting best practice in all aspects of corporate governance and is committed to supporting the UK Government's National Action Plan to implement the UN Guiding Principles on Business and Human Rights.

### **3. Our Policies on Slavery and Human Trafficking**

- 3.1** The University endeavours to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our workplace policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.
- 3.2** The University has comprehensive recruitment procedures and requires all staff participating in the process to undertake recruitment training, which includes content relating to modern slavery and human trafficking to support legal compliance and best practice in this area. Robust checks are carried out to ensure that all new staff have the right to work within the UK. Where it is necessary to hire external agency workers, our staff are directed to specified, reliable and accredited agencies that have undergone appropriate evaluation through the University's procurement procedures and meet our mandatory selection criteria regarding their employment policies and practices.
- 3.3** The University adheres to The Public Interest Disclosure Act 1998 and implements its own Whistleblowing Policy regarding concerns about potential corruption, fraud, or unethical conduct within the University. If any modern slavery cases were to be suspected on-site, any alleged violation of human rights would be fully investigated, and formal action taken against any member of staff.
- 3.4** The University recognises that it has a legal duty of care with respect to safeguarding and has put appropriate procedures in place in relation to this. The Safeguarding Policy (and associated Safeguarding Procedure) provides details of the necessary steps to be taken should allegations be raised of harm or abuse (including human trafficking) against children or vulnerable adults.
- 3.5** Our People Strategy and the University's policies covering equity, diversity, safeguarding and whistleblowing can be found via the following links (this is not an exhaustive list):

- [EDI strategy and objectives - Keele University](#)
- [Safeguarding Policy - Keele University](#)
- [Whistleblowing Policy - Keele University](#)
- [People strategy](#)

## 4. Procurement and Supply Chains

**4.1** Public sector procurement is governed by the **Procurement Act 2023**, which came into effect on 24 February 2025, replacing the Public Contracts Regulations 2015 and other EU-derived procurement rules. The Act establishes a new legal framework for public procurement in the UK, underpinned by principles of public benefit, transparency, and integrity.

Under the Procurement Act 2023, contracting authorities like Keele University must have regard to the importance of:

- Delivering value for money
- Maximising public benefit
- Sharing information to enable effective and transparent public procurement
- Acting, and being seen to act, with integrity

These principles align with our commitment to ethical and responsible procurement. Where procurements exceed relevant thresholds, we continue to follow the procedural requirements set out in the Act, including the requirement to assess suppliers' past performance and their compliance with modern slavery legislation

**4.2** The Procurement Act 2023 introduces a more flexible framework for considering ethical issues in procurement. While value for money remains central, the Act explicitly recognises that public benefit, including social value and ethical considerations, can form part of the assessment. This enables the University to take a broader view of supplier conduct, including their approach to modern slavery, human rights, and environmental sustainability, where these are relevant to the delivery of the contract.

Ethical considerations that are relevant to the subject matter of the contract may arise where there is a risk to the University from a supplier being unable to deliver the product or service on time and of sufficient quality due to, for example, insufficient health and safety provisions for its employees. If a clear link can be established between poor conditions of employment and the ability or motivation of an employee to maintain required quality standards, this will be relevant to the delivery of services or manufacture of products.

The Act also introduces a mandatory debarment regime, preventing suppliers convicted of modern slavery offences from bidding for public contracts. The University supports this approach and will, where appropriate, exclude suppliers who cannot demonstrate compliance with the Modern Slavery Act 2015.

The University has a statutory obligation to comply fully with the new transparency requirements under the Act, including the publication of contract award notices, contract details, and

procurement performance data. The University supports this commitment to openness and will ensure our procurement decisions, and the ethical standards we require, are publicly visible.

**4.3** The University's Responsible Procurement Strategy 2022-2027 outlines our principles and practices for the acquisition of goods, services and building works. We have integrated modern slavery into the University's terms and conditions for purchase contracts. Suppliers are required to:

- a. Comply with the UK Modern Slavery Act 2015 and all other applicable laws regarding anti-slavery and human trafficking.
- b. Maintain their policies to ensure compliance.
- c. Perform due diligence on their supply chains and include anti-slavery and human trafficking provisions in their supply contracts.
- d. Notify the University of any breaches and provide the University with annual compliance reports.

**4.4** Any breach of these obligations is specifically deemed a material breach of contract, which would entitle the University to terminate such contract with immediate effect where appropriate. If evidence were found indicating modern slavery in our supply chains, we recognise our responsibility to work with others to address this and reserve the right to terminate contracts where serious violations are discovered.

**4.5** The requirement for suppliers to comply with the Modern Slavery Act and the International Labour Organisation (ILO) fundamental conventions is included in our contract notices, European Single Procurement Document checks, and Invitation to Tender documentation, where relevant. These measures are also in place for non-regulated construction procurements.

**4.6** The University operates a centralised procurement service for the provision of goods and services and has a Purchase 2 Pay (P2P) management system to ensure that staff only make purchases, other than small expenses, using established processes. New suppliers to the University are onboarded through a rigorous vetting process and are required to complete a self-declaration form to confirm they meet the requirements of the Modern Slavery Act, where applicable. Modern slavery and human trafficking forms part of the University's Sustainable Procurement Strategy.

**4.7** The University has a supplier database of approximately 3893 suppliers and our procurements can either be through a regional Higher Education or other Public Sector purchasing consortiums or through direct contracting. All procurement activities are managed through a centrally controlled Procurement department, which sits within the Finance Directorate.

**4.8** We recognise there are risks of modern slavery in the supply chains for all types of goods and services procured by the University. The University purchases a wide range of products and services. The main categories of expenditure are as follows:

- Laboratory consumables and equipment
- Estate-related
- Professional services
- Library
- IT equipment and services
- Catering

**4.9** We work with our suppliers using an online tool provided by NetPositive Futures that asks and actively assists all our suppliers to develop an action plan that addresses modern slavery and other key sustainability issues within their businesses and supply chains. In this way, the University is taking proactive steps to ensure its contracting arrangements comply with all the relevant legislation in both areas.

**4.10** We contact our suppliers to ask them about impacts arising from their business activities, including slavery within their supply chains, and providing an opportunity for them to tell us how they are addressing these issues. The same process is used for all new suppliers who are encouraged to access the supplier engagement tool. This enables us to understand the status of these activities in our supply base and to encourage and support good practice.

**4.11** We continue to engage our supply chain to ensure our contracted suppliers are signed up to the supplier engagement tool, NETpositive Futures, which allows the University to offer free bespoke sustainability action plans, including an assessment of their Modern Slavery Statements.

**4.12** To enable us to target our analysis to ensure we focus on areas at potential risk of incidents of modern slavery in the supply chain, we have analysed our supply base and we continue to monitor the following high-risk areas:

- Information technology equipment
- Furniture
- Catering
- Construction and maintenance services

## 5. Information Technology Equipment

**5.1** The University is an affiliated member to Electronics Watch, the independent monitoring organisation that aims to help public sector organisations work together to meet their responsibility to protect the labour rights and safety of workers in global electronics supply chains more effectively than any single public buyer could accomplish on its own. Full members benefit from Electronics Watch affiliation, including access to guidance, resources and contract clauses that support responsible procurement.

**5.2** Electronics Watch's aligned terms and conditions have been embedded within various Public Procurement awarded IT framework agreements used by the University. Suppliers provide details of the factories in which the ICT equipment we buy are produced, and Electronics Watch works with civil society organisations in the countries where the factories are located to monitor working conditions.

**5.3** The University purchases most of its IT and IT consumables from framework arrangements that are managed by a Higher Education consortium: the London Universities Purchasing Consortium. The University is a member of The North Western Universities Purchasing Consortium (NWUPC). NWUPC is an affiliate member of Electronics Watch on behalf of its members, joining over 330 affiliates across Europe and Australia who work together to protect labour rights in global electronics supply chains. Affiliate members can access the following tools and events:

- a. Workers' Grievances in Electronics Manufacturing in China: A Study of Dell's and HP's Supply Chains, London Universities Purchasing Consortium contributed to this study along with the Stockholm County Council, Advanced Procurement for Universities & Colleges, and

Hanzehogeschool. The study seeks to understand electronics workers' grievances in China through the lens of their social media posts, collected with the Social@risk™ tool. The quantitative sample consists of 1.3 million posts from January 2014 to April 2018. The qualitative analysis sample includes 600,000 posts from January 2016 to April 2018. All posts are related to 38 final assembly and original design manufacturers (ODM) suppliers to Dell and HP. The study highlights workers' grievances related to forced labour, student labour, excessive working hours, and health and safety among other areas. The report identifies priority issues for workers that need particular attention or new approaches.

- b.** Public Buyer Toolkit: Supports communication and promotes contract performance compliance within affiliates' supply chains. It contains standardized and easy-to-use tools like the Letter to Suppliers, Factory Disclosure Form, Guidelines for Disclosure of Factories, and the Electronics Watch Contract Conditions.
- c.** Affiliate Action Guide: Summarises Electronics Watch compliance findings and recommended affiliate actions. Electronics Watch currently serves over 330 affiliates across Europe and Australia, with monitoring partners in twelve countries.
- d.** Company Performance Tracker (CPT): developed in 2018 and launched in 2019, the CPT scores contractors' and brands' supply chain transparency and efforts to remediate labour rights violations in specific factories based on their interaction with affiliates and Electronics Watch. While the methodology will be publicly available and regularly reviewed and updated, the CPT scores will only be available to affiliates.
- e.** Knowledge Building Series (2025): In autumn 2024, Electronics Watch launched a three-year Innovation Pilot comprising the 'Knowledge Building Series'—a programme of webinars and workshops designed to help public buyers understand modern slavery and human rights risks in specific purchasing categories. The series provides participants with practical guidance to comply with regulatory requirements and strengthen socially responsible procurement capacity. LUPC members have access to these sessions, including workshops on evaluating supplier evidence such as self-assessment questionnaires, ESG risk ratings, and modern slavery statements.
- f.** Electronics Watch Annual Report: Provides comprehensive overview of monitoring activities, remediation outcomes, and sector-wide progress on labour rights in electronics supply chains.
- g.** Affiliate LinkedIn Group: A private online community enabling procurement professionals to share resources, tools, and best practices.
- h.** Specialist Guidance: Including resources such as 'How to Protect Workers from Chemical Hazards in Electronics Supply Chains' and regional risk assessments for key manufacturing regions

## 6. Furniture

**6.1** As a member of NWUPC, the University purchases most of its furniture from frameworks that are managed by the NWUPC. The levels of risk have been identified within the category strategy document by the NWUPC and appropriate actions considered.

**6.2** The University monitors risk at regular review meetings with suppliers using supplier action plans which have been developed using the NetPositives Future tool.

## **7. Catering**

**7.1** As part of the University's Sustainable Food Policy the University prioritises ethical and responsible sourcing by (a) purchasing high welfare meat and dairy products; (b) sourcing sustainable seafood that is Marine Stewardship Council certified; and (c) sourcing fairly traded food, drink, and other products for our operation.

**7.2** The University purchases food through frameworks which are managed by The University Caterers Organisation Ltd which is committed to ensuring that there is no modern slavery or human trafficking within its supply chains.

## **8. Construction and Maintenance Services**

**8.1** The University procures most of the construction and maintenance services in line with its tendering procedures, whereby all construction procurements (irrespective of whether the value of the works is above or below the OJEU threshold) include as part of the selection stage evaluation a pass/fail assessment requiring the tenderer (and each key subcontractor/member of the bidding consortium as applicable) to confirm that either:

- a.** they are not a relevant commercial organisation as defined by section 54 of the Modern Slavery Act 2015; or
- b.** they are a relevant commercial organisation and can demonstrate compliance with the annual reporting requirements contained within section 54 of the Modern Slavery Act 2015.

**8.2** This approach is consistent with the Government's Procurement Policy Note: Standard Selection Questionnaire. Successful contractors are encouraged by the University to follow the Ethical Trading Initiative Base Code which is founded on the conventions of the International Labour Organisation and is an internationally recognised code of labour practice.

**8.3** The University will occasionally procure works via a call-off under an existing public sector framework agreement established by another contracting authority but will still include the same Modern Slavery pass/fail assessment within the further competition evaluation. Large maintenance services contracts procured by the University also follow the same approach.

## **9. Staff Training and Awareness**

**9.1** As a University, we work in collaboration to build a sustainable, high-performance organisation in which all staff and students are fully engaged and who are enabled to make an effective and relevant contribution.

**9.2** Equality and diversity are at the heart of the University's Strategic Plan in terms of the services and opportunities we provide, and through valuing the rights, responsibilities, dignity, health, and wellbeing of all individuals in the University.

**9.3** We are continuing to undertake the following steps to raise awareness and understanding regarding the issue of modern slavery and human trafficking in our supply chains both internally

and externally:

- A group of senior University officers oversees current awareness activities and meets at least annually to ensure adequate awareness-raising is taking place.
- The group ensures that the University’s annual Modern Slavery and Human Trafficking Statement is up to date. The statement is approved by the University Council and signed by the Vice-Chancellor.
- Training is undertaken by staff in those functional areas identified as requiring significant awareness of the risks regarding modern slavery such as Procurement and areas of commercial and Estates-related activities, over 100 staff have completed an e-learning module on Modern Slavery and Human Rights.
- A human rights professor from Keele’s School of Law has been appointed to a prestigious post by the United Nations Human Rights Council, to help tackle modern slavery around the world. Professor Tomoya Obokata, an expert on human rights and international law, has been appointed as the Special Rapporteur on Contemporary Forms of Slavery at the recent UN Human Rights Council meeting in Geneva. Professor Obokata’s post is often referred to as a human right “expert on mission” and involves working with a number of international stakeholders to tackle modern slavery in all its forms across the globe. Working alongside governments, non-government organisations and other international partners, Professor Obokata will examine and report on slavery and slave-like practices around the world, Professor Obokata’s appointment is a testament to his world-leading expertise and research in this field.
- Keele University researchers Professor Tomoya Obokata and Dr Forough Ramezankhah have published a new report into the impact of Covid-19 on modern slavery which details best practice and recommendations for the protection of vulnerable workers from the effects of the pandemic.

## 10. Research, teaching, and partnerships

**10.1** The University provides various programmes and courses that specifically examine issues of modern slavery, human trafficking, and exploitation. A range of courses and research is also focused around developing our knowledge of human rights and the anti-slavery agenda in more detail, enhancing high-level research skills to explore the world of modern slavery including the current threat landscape, with consideration of the approaches to preventing exploitation, rescuing victims, and restoring lives, and the responsibility of employers and businesses to end exploitation in the workplace, alongside other subtle traces of modern slavery.

**10.2** We do this by enabling and supporting our staffs and students to uncover the presence of modern slavery within the UK and overseas, with consideration of the global impact on victims and citizens, providing an international outlook on the challenges of modern-day labour. We partner with leading charities including Hope for Justice, Unseen, Sophie Hayes Foundation and Ride for Freedom to explore their strategies in tackling human trafficking and exploitation.

**10.3** University of Keele researchers delivers a broad base of innovative academic work and education as a means to develop individuals’ strengths and flexibility for the future. Our students will see the world differently and stand out in their determination to make a positive difference; demonstrating this through their knowledge, skills, attitudes, and beliefs in a tolerant, diverse society that delivers equality of opportunity.

**10.4** Our world-class research and researchers including our flagship interdisciplinary Institutes in Global Health, Social Inclusion and Sustainable Futures and Digital Society Institution constantly pushes the limits of current knowledge and understanding; ensuring that the outputs have impact through our teaching, public engagement, and the partnerships we form.

**10.5** The Keele Institute for Innovation and Teaching Excellence (KIITE) and an Education Vision; delivers an inspiring portfolio and curriculum that is innovative, attractive, and dynamic.

**10.6** We partner with a wide range of people and organisations, on campus, and across the world to undertake a large proportion of our research in cooperation with a range of organisations from business, charity, government, the NHS, local authorities, cultural sectors and directly with the public.

**10.7** Our research contracts reflect the University's modern slavery approach. Research funders and collaborating partners are required to confirm equivalence with the University's ethical commitments. All staff in the University Research and Innovation Support (RaISE) Teams have been briefed on modern slavery risks and the Modern Slavery Awareness course is part of the list of Research Integrity trainings for University researchers. Awareness of modern slavery risks has also been incorporated into Ethical Research Partnerships guidance for staff and students working with organisations and institutions overseas. The Academic Collaboration Agreement Templates used by our RaISE require our partners to comply with all applicable laws and regulation relating to anti-slavery and human trafficking, and not to engage in any activity, practice or conduct which would constitute an offence under the Modern Slavery Act.

**10.8** Our Research Ethics Policy and the annual research report provide a snapshot of the work being carried out across the University to put our institutional commitment to strengthening the integrity of our research into practice and compliance with the Modern Slavery Act.

## **11. Our Plans for the Future**

**11.1** We commit to better understand our supply chains. We will continue to implement and develop the following action plan to identify and mitigate any risks that Modern Slavery and Human Trafficking represent in our business and supply chains:

- We will continue to raise awareness of modern slavery issues amongst our suppliers and staff, encourage transparency amongst our suppliers and continue to carry out supplier risk assessments where concerns arise.
- We will continue to review existing policy statements and introduce additional governance around the University's ethical investment policy, fundraising and income generation and research, teaching & partnerships to specify our commitments and responsibilities in these areas.
- We will share our due diligence practices in relation to modern slavery and human trafficking with our suppliers and partners.
- We will review and monitor supplier action plans through regular contract management and support initiatives to reduce the risk of modern slavery and human trafficking occurring.
- We will continue to review and monitor supplier action plans developed through the NETpositive toolkit.

- We will continue to provide training for relevant staff on compliance with the Modern Slavery Act 2015.
- We will continue to review and update all relevant policies and controls to embed awareness in relation to modern slavery and human trafficking.
- We will continue to develop further research collaborations related to modern slavery risks and solutions.

Professor Kevin Shakesheff | Vice-Chancellor | University of Keele –

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