

Modern Slavery and Human Trafficking Statement 2022

Introduction

The following statement is published in accordance with section 54(1) part 6 of the Modern Slavery Act 2015. It is intended to communicate the activities undertaken during the financial year ended 31 July 2022, and the objectives for the financial year ending 31 July 2023 in our continued efforts to ensure that slavery and human trafficking is not taking place in our supply chain.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Organisational structure

Birkbeck is a unique institution providing access to degree education for working Londoners through the provision of teaching in the evening. Consequently, most of our students are mature and have jobs, caring or other responsibilities during the day. The fact that we are different from most higher education providers in the UK (who mostly teach young undergraduates during the day) often means that Government policy and other external factors have a different, and often unexpected, influence on Birkbeck. Based in the heart of Bloomsbury, we are a leading research university and a vibrant learning community offering over 200 undergraduate and postgraduate programs. Academic activities are organised into five schools which are subdivided into nineteen departments, supported by various central services.

Founded in 1823 by the philanthropist Dr George Birkbeck, the College is a body incorporated by Royal Charter and an exempt charity under the terms of the Charities Act 2011. Under the Charities Act, universities are overseen by the Office for Students as principal regulator with the responsibility for ensuring that universities fulfil their obligations under Charity Law.

During the year the College reported annual turnover of £108.2 million, other operating expenditure (including agency and contract staff costs but excluding staff costs) of £29.6 million and employed 1,189 full time equivalent staff.

Our mission

The principal aims of Birkbeck are to:

- provide flexible and part-time higher education courses which meet the changing educational, cultural, personal and career needs of students of all ages: in particular, those who live or work in the London region
- enable mature students from diverse social and educational backgrounds to participate in our courses

- make available the results of research, and the expertise acquired, through teaching, publication, partnerships with other organisations and the promotion of civic and public debate.
- maintain and develop excellence in research and provide the highest quality research training in all our subject areas.

Our commitment

Our workplace policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships. We continue to implement and enforce effective systems and controls and use all reasonable endeavours to ensure that slavery and human trafficking are not taking place in our supply chain.

A range of policies and procedures set out our commitment to workplace rights and ensure that our employees are treated fairly with dignity and respect. These policies, which are reviewed regularly, include, but are not limited to:

- [Equality and Diversity](#) - sets out the College's legal obligations under the Equality Act 2010 and the various ways in which we meet our duties
- [Gender pay gap](#) - looks at pay disparity across the organisation
- [Dignity at Work and Study](#) - supports our provision of an inclusive working and learning environment
- [Disciplinary and dismissal procedure](#) - encourages staff to improve and maintain the required level of conduct
- [Public Interest Disclosure \("Whistleblowing"\)](#) - enables staff to report improper conduct or unethical behaviour
- [Anti-Bribery and Corruption Policy](#) - sets out our responsibilities and position on bribery and corruption.

Our Human Resources department provide advice to staff and ensure our people policies and procedures, including those related to recruitment of staff, are consistently applied across the institution.

We use the national single pay spine structure which is operated by most higher education institutions in the UK. We are accredited as a London Living Wage employer (since 2015) and are committed to paying staff at least the London Living Wage.

To identify possible inconsistencies between policy and practice we undertake institution-wide staff surveys. These include questions about the experiences of staff in relation to instances of bullying/harassment/discrimination and the ability to manage work-life issues as employees of the College. The results are compared against past surveys and sector benchmarks. Action plans are developed to make improvements where required. The survey results, analysis and actions are included in the institutional Athena SWAN submission.

Staff are expected to uphold the seven principles of behaviour on Standards in Public Life ('Nolan

Principles') within all day-to-day activities. This includes our clear commitment to a zero-tolerance approach to modern slavery.

Specialist training is undertaken by certain staff whose primary job function is procurement. Staff are either qualified Members of the Chartered Institute of Procurement and Supply (MCIPS) or will be actively working towards the qualification. Additional training is available for these staff to widen skills and keep their knowledge current.

Our supply chains

As a complex business we have a large and diverse supply base supporting our teaching and research activities. While most of our suppliers are based in the UK we do purchase goods and services from abroad. Our supply chain is constantly evolving so understanding the supply chain and the risks is an ongoing activity. Focussing on the high-risk areas means we can use our limited resources effectively to contract with suitable and responsible suppliers and promote best practice.

We are committed to protecting and respecting human rights through continuous improvement of purchasing practices, contract management and supply chain management operations. We continually review our procurement documentation and processes to ensure they reflect best practice and support our objectives. We have a number of due diligence processes to assess and manage our suppliers and their products.

We consider the following categories to be high risk commodity and service areas.

- Estates development and infrastructure
- Professional and bought-in services including consultancy
- Laboratory supplies
- Audio visual, IT, and telecoms
- Travel and transport (including vehicle hire and subsistence)
- Janitorial and security provisions
- Catering supplies and services
- Furniture, furnishings, and textiles

We are members of a number of purchasing consortia including the London Universities Purchasing Consortium (LUPC). These memberships give us access to countrywide frameworks and consortia negotiated contracts, which we use where appropriate.

The LUPC is committed to supporting international human rights standards, the UN Guiding Principles on Business and Human Rights (UNGPs) and the UK Government's National Action Plan to implement the UNGPs. Through our LUPC membership we are an associate member of Electronics Watch (EW), a membership body which works to achieve respect for labour rights in the global electronics industry through socially responsible public purchasing in Europe. Sector wide collaboration reinforces the positive behaviours with regard to social, ethical, economic and environmental practices expected from our suppliers.

Our progress

During the year we continued our work on supply chain mapping, reviewed our procurement policies and procedures and raised awareness of modern slavery amongst staff by encouraging those involved in sourcing and tendering activities to complete the British Universities Finance Directors Group (BUFDG) e-learning courses on a Guide to Modern Slavery and Protecting Human Rights in the Supply Chain. In addition:

- We brought our provision of catering in-house and we now directly employ these staff thereby reducing our risks in this supply chain. Our previously outsourced cleaning and security provisions were brought in-house in 2019/20.
- We formed a Modern Slavery working group whose principal aims include making recommendations to Strategic Planning Committee, monitoring progress against the agreed objectives and raising awareness of Modern Slavery and Human Trafficking across the organisation. The group meets termly and comprises academic and non-academic staff.
- We extended our modern slavery questionnaire to suppliers whose turnover is below the mandatory reporting threshold and received a good response. We will continue to engage at this level in the coming year to raise greater awareness of modern slavery and human trafficking.

Our plans for the future

Over the coming year we will continue to monitor and map our supply chains and apply all due diligence in a spirit of openness and transparency with our supplier partners to reduce any risk of modern slavery and human trafficking.

We will continue to ensure our modern slavery statement is prominently displayed on our website along with previous statements.

Our key objectives for the coming year will be to:

- Continue to raise awareness by encouraging staff to complete the Higher Education Procurement Association (HEPA) Guide to Modern Slavery course. Our targeted approach will ensure those staff and departments working with the suppliers in the high-risk categories have a good understanding of what constitutes modern slavery and human trafficking and how to raise concerns.
- Trial the Government Modern Slavery Assessment Tool (MSAT) with those suppliers in our high-risk categories that are required to report on modern slavery. The tool gives each supplier a risk rating based on a short questionnaire. We will work closely with suppliers to understand their risk rating and encourage them to use the feedback from the tool to make any required improvements.
- Explore use of Proc – HE codes for a new supplier on-boarding process to identify suppliers who trade in commodities where potential for modern slavery and human trafficking is higher risk. The use of Proc-HE codes in this way draws upon the collaborative work and outputs of the Higher Education Procurement Association's (HEPA) Responsible

Procurement Group.

Approved by

Board of Governors

A handwritten signature in black ink, consisting of a stylized 'F' followed by a large, sweeping flourish.

Chair of Governors

For and on behalf of Birkbeck, University of London

November 2022