

MODERN SLAVERY STATEMENT

This statement sets out Falmouth University's actions to understand its potential modern slavery risks and to put into place steps that are aimed at ensuring that there is no slavery or human trafficking in its operations or its supply chains.

This statement complies with Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps that the University has taken regarding slavery and human trafficking.

ORGANISATION: FALMOUTH UNIVERSITY

APPLIES TO: STAFF & STUDENTS

POLICY OWNED BY: EXECUTIVE DIRECTOR, FINANCE AUDIT & RISK

REQUIRED CONSULTEES: UNIVERSITY MANAGEMENT COMMITTEE; HEAD OF PROCUREMENT; CHIEF PEOPLE OFFICER

APPROVED BY: UNIVERSITY EXECUTIVE BOARD

DATE APPROVED: TUESDAY, 08 APRIL 2025

REVIEW DATE: THURSDAY, 08 APRIL 2027

MODERN SLAVERY STATEMENT

This statement sets out Falmouth University's actions to understand its potential modern slavery risks and to put into place steps that are aimed at ensuring that there is no slavery or human trafficking in its operations or its supply chains.

This statement complies with Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps that the University has taken regarding slavery and human trafficking.

This statement is structured in line with the Home Office's [statutory guidance](#) which recommends that six key areas are covered:

1. Organisation structure and supply chains
2. Policies in relation to slavery and human trafficking
3. Due diligence processes
4. Risk assessment and management
5. Key performance indicators to measure effectiveness of steps being taken
6. Training on modern slavery and trafficking

1 ORGANISATION

This statement covers the activities of Falmouth University ("the University").

Falmouth University is a specialist University which delivers exceptional higher education and research, harnessing the fusion of creativity and technology as foundations of the future economy. The University has held Taught Degree Awarding Powers since 2004 and was granted full University status in 2012. The University has an annual turnover exceeding £75 million, over 7000 students studying on campus, online and through academic partnerships, and around 700 members of staff (financial year end 2023/24).

2 POLICIES

The University is committed to protecting and respecting human rights and has embodied this ethical stance in a number of its policies including but not limited to:

Research Integrity and Ethics Policy
Responsible Procurement Policy
Safeguarding Policy

3 DUE DILIGENCE

Our supply chains efforts are focussed on our Tier 1 suppliers which we primarily rely on to deliver our business objectives. Our due diligence is based on selecting appropriate suppliers and the use of relevant external standards.

Our process are designed to ensure that we enter into contracts with suitable and responsible suppliers:

- Suppliers are contracted via a formal tender process or a suitable public sector framework agreement.
- Our contracted suppliers are subject to a formal selection process to ensure that they are suitable and meet our needs.
- The evaluation considers the capability and capacity of organisations to supply what we require and includes an assessment of, amongst other things, their supply chain practices and adherence to modern slavery legislation.
- The University is in partnership with a number of procurement consortia including the SUPC (Southern Universities Procurement Consortium) and is fully reassured that they are applying robust measures to their procurement and framework agreements
- The University maintains clear procurement templates, including the SSQ (Supplier Selection Questionnaire) and tendering documentation to ensure that they are in line with regulatory requirements around modern slavery.
- The University maintains its standard terms and conditions for purchasing goods, works and services, together with its contracts for contractors and consultants, to include an obligation to comply with the Modern Slavery Act and to pass this down the supply chain.

As part of our ongoing due diligence work we will be reviewing our practice against the UK Government's April 2023 guidance on [Tackling Modern Slavery in Government Supply Chains \(PPN 02/03\)](#).

4 RISK ASSESSMENT

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 in order to exploit them for personal or commercial gain.

The organisation recognises that it has a responsibility to take a robust approach and is committed to ensuring that its supply chains are free from slavery and human trafficking.

In the financial year 2023/24, the University spent circa £40m gross with over 1,500 suppliers. Items and services valued at and above £2,500 was managed by the Procurement Team to ensure compliance with legislation and to achieve value for money on bought in goods and services.

Falmouth University's supply chains fall under five main categories:

1. Science, technical, engineering goods and services
2. Corporate services, including travel
3. ICT equipment and services
4. Estates goods and services
5. Agency workers

Suppliers in these higher-risk areas (listed above) will be asked to commit to the Base Code of the Ethical Trading Initiative (ETI) <https://www.ethicaltrade.org/>. The University will work to persuade suppliers in these categories to support these initiatives. The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice, requiring that:

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour is not used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practised
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

The University has not identified any instance of a breach of the Modern Slavery Act in its supply chain to date. Additionally, the University is of the view that a breach of the Modern Slavery Act would be a material breach of its contracts.

In a scenario where the University identified any instance of Modern Slavery in its supply chain, it would seek to take action in accordance with due process. Actions would include informing the relevant legal authorities and terminating the contract. The Procurement Team works to a category management approach, which gives a greater granularity of detail regarding categories of spend. This will enable the University to reduce its supply base and have greater scrutiny of suppliers and their supply chain.

People and Culture (Human Resources)

Our People and Culture Team and recruiting managers follow recruitment policies and processes which are regularly reviewed for compliance and legislation.

Potential employees have to provide 'right to work' information which is checked before they commence employment. The majority of interviews are conducted face-to-face which helps to ensure that individuals have freely chosen to attend. All application forms are verified in line with standard pre-employment checks as being the applicants own information, including taking a copy of the individuals original 'right to work' documentation.

All employees receive a written contract of employment. The People and Culture Team also provide information to all new employees on their statutory and contractual rights including sick pay, holiday pay and other benefits they may be entitled to.

Where recruitment agencies are used, the University requires that such agencies comply with all UK legislation relating to the employment rights and welfare of candidates.

5 KEY PERFORMANCE INDICATORS

Falmouth University have implemented the NET Positives supplier tool that provides a mechanism to engage suppliers with the issue of modern slavery.

Adoption of the tool aligns with the duties set out within the Modern Slavery Act and enables suppliers to develop their own action plan to ensure they have addressed Modern Slavery conditions (<https://netpositivefutures.co.uk>).

We monitor the impact and effectiveness of our work using a number of key performance indicators:

- 99% of our suppliers are aware of the Modern Slavery Act.
- 77% of our suppliers have published a Modern Slavery Statement.
- 27% of our suppliers felt modern slavery was an issue for them in their supply chains
- 26% of our suppliers has over 25% of their goods or services provided from outside Europe.

6 TRAINING & GOVERNANCE

The procurement team have arranged training for all operational staff via the HEPA (Higher Education Purchasing Association) e-training portal <https://hepa.ac.uk/resources/e-learning/>.

Where staff or others have concerns about potential breaches of the Modern Slavery Act, these can be raised directly with the Secretary to the Board of Governors at vcoffice@falmouth.ac.uk.

7 FUTURE STEPS

Falmouth University is committed to developing our policies, processes and procedures to ensure on-going compliance with the Modern Slavery Act and to ensure the policies around a zero tolerance to incidents of human trafficking and slavery are embedded.

We will:

- Continue to maintain our training programmes with both internal stakeholders and external suppliers.
- Will continue with on-going reviews of potential categories of high risk.
- Review and propose new KPI's.
- Review our approach to training and awareness.
- Enhance our public engagement role on modern slavery.



Professor Emma Hunt
Vice-Chancellor & Chief Executive
8 April 2025