

MODERN SLAVERY STATEMENT

This statement sets out Falmouth University's actions to understand all potential modern slavery risks related to its business and to put into place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and 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 & FX PLUS

APPLIES TO: STAFF & STUDENTS

POLICY OWNED BY: HEAD OF PROCUREMENT

REQUIRED CONSULTEES: VCEG, FX PLUS SENIOR EXECUTIVE TEAM

APPROVED BY: VCEG, FX PLUS SENIOR EXECUTIVE TEAM

DATE APPROVED: MONDAY, 03 OCTOBER 2022

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1 FALMOUTH UNIVERSITY

This statement covers the activities of Falmouth University. Falmouth University is a specialist creative multi-arts institution based in Falmouth and Penryn and was granted full University status in 2012.

Falmouth University provides our academic community of staff, students and visiting lecturers with a diverse and inclusive environment. Falmouth University has an annual turnover of £60 million, around 500 members of staff and a global reputation for excellence in research, scholarship and creative practice.

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;

[Falmouth University Ethics Policy](#)

[Professional Code of Conduct](#)

[Dignity and Respect at Work](#)

[Responsible Procurement Policy](#)

3 BACKGROUND

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.

4 PROCUREMENT

In the financial year 2021/22, the University spent circa £40m gross with over 2,500 suppliers. Items and services valued at and above £1,000 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 will be asked to commit to the Base Code of the Ethical Trading Initiative (ETI) <https://www.ethicaltrade.org/>. Falmouth 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

5 TRAINING

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/>.

6 PROCUREMENT AND CONTRACT DUE DILLIGENCE

The University maintains its 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 also works 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 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.

7 IDENTIFYING INSTANCES OF MODERN SLAVERY IN THE SUPPLY CHAIN

The University has not identified any instance of a breach of the Modern Slavery Act in its supply chain. 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. Procurement at the University 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.

8 RAISING CONCERNS

Where staff or others have concerns about potential breaches of the Modern Slavery Act, these can be raised directly with the Director of Business Services rob.holmes@falmouth.ac.uk

9 MONITORING AND AUDITING

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 provides a simple response to the Modern Slavery Act and enables suppliers to develop their own action plan to ensure they have addressed Modern Slavery conditions. 99% of our suppliers currently registered on the Net Positives tool have a Modern Slavery Statement and Policy in place. <https://netpositivefutures.co.uk>

10 HR STATEMENT

Falmouth University directly employs approximately 700 employees and we have a thorough set of employment related policies and procedures to prevent the possibility of modern slavery occurring within our workforce.

Our Human Resource (HR) Department 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 ensures 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. HR 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.

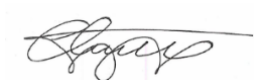
11 FUTURE STEPS

Falmouth University is committed to developing it's 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.

In conjunction with the Universities strategies, we are committed to adopting the principles of UN's 17 Sustainable Development Goals including Goal 8 (Decent Work and Economic Growth) and Goal 10 (Reduced Inequalities) <https://sdgs.un.org/goals>

We will continue to maintain our training programmes with both internal stakeholders and external suppliers and will ensure on-going reviews of potential categories of high risk.

Chris Jones
Head of Procurement



October 2022