

# Modern Slavery and Human Trafficking Statement

<b>Policy Name – Modern Slavery and Human Trafficking Statement</b>	
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<b>Policy Owner</b>	<b>Policy Author/Reviewer</b>
Elaine Hartin Chief Finance and Strategy Officer	Clare Egan Procurement
<b>Approving body</b>	<b>Date of approval</b>
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	August 2025
<p>Queries relating to this document should be directed to – Clare Egan,  <a href="mailto:cm.egan@ulster.ac.uk">cm.egan@ulster.ac.uk</a></p> <p>This document can be made available on request, in alternative formats and in minority languages to meet the needs of those who are not fluent in English.</p>	



## **Modern Slavery Act 2015**

### **Modern Slavery and Human Trafficking Statement**

#### **Introduction**

Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor 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.

At Ulster University we are committed to our values and apply these in our approach to combating Modern Slavery and Human Trafficking. We are committed to improving our practices to ensure that modern slavery and human trafficking does not occur in any part of our organisation or supply chain.

#### **Organisational Structure**

Ulster University is grounded in the heart of the community and strives to make a lasting contribution to society. Renowned for world-class teaching, Ulster aims to transform lives, stretch minds, and develop the skills required by a growing economy. The outcomes of our research have global significance with local relevance, and contribute to the social, economic and culture betterment of our region.

With an annual turnover of £281m, Ulster University is one of the region's largest employers with 2,900 staff.

The University is registered with the Charities Commission for Northern Ireland, and has clear responsibility, as a charity, to act for the public benefit across all its activities.

#### **What we are doing now**

##### **Supply Chains**

The University has a supplier database of over 9,000 suppliers and our procurements can be either through various consortium framework agreements or through a competitive competition. All procurement activities over £30k are managed through a centrally controlled Procurement department, which sits within the Finance Directorate.

The University purchases a wide range of products and services which adds to the complexities of our supply chain. We are continually collaborating with our suppliers using an online tool, provided by NetPositive Futures, that asks and actively assists all our suppliers through the tool, to develop an action plan to address Modern Slavery and other key sustainability issues within their business and supply chains. In this way, the University is taking proactive steps to ensure its Supply Chain is aware of all the relevant legislation around Modern Slavery. Training has also been provided to procurement staff to ensure that they are aware of modern slavery and human trafficking issues.

## **Employment of Staff**

We ensure that staff employed directly follow a robust set of employment policies and procedures. The University understands its responsibilities under immigration law and has robust mechanisms in place to ensure that we only employ people who have lawful entitlement to work in the UK.

We also have a Dignity at Work and Study Policy and a Safeguarding Policy to ensure the protection of staff, and a Raising Concerns (Whistleblowing) Policy for staff who wish to report wrongdoing in these areas.

For staff recruited on a temporary basis, we only partner with reputable agencies who comply with our supplier policies.

## **People**

Our People and Culture policies are reviewed regularly to ensure that these meet all legislative requirements.

## **Fundraising and Investment**

We are committed to ethical investment standards, and these are reflected in our Ethical Investment Policy Statement. The current review of our Acceptance of Gifts and Donations Policy will also allow us to integrate modern slavery and human trafficking awareness and procedures into this area of our business.

## **International Partnerships**

Strategic international partnering delivers multiple benefits for Ulster. Its services enhance our global position and profile, extend opportunities for staff and students, unlock new initiatives in international teaching, research and delivery and support the University's wider mission.

The University, through its Global Engagement strategy has committed to a rigorous approach, identifying high value partnerships, and securing opportunities to work with likeminded institutions, in support of shared objectives, values and challenges.

Global Engagement partnership evaluation is undertaken in line with the Global Partnerships Protocol. This protocol and our Global Engagement Policy demonstrate our commitment to acting ethically and with integrity in developing our growing network of partnerships.

## **Our Commitments**

### **Procurement**

Building on the baseline we have established, we continue to ensure Modern Slavery is considered as a fundamental part of the procurement process, and that we continue to both challenge and support our supply base. More specifically we will:

1. Increase the use of the supplier engagement tool within high-risk modern slavery sectors.
2. Increase the number of practical actions taken by our suppliers when responding to modern slavery.

3. Continue to develop modern slavery awareness amongst the procurement professionals and contract managers with the university.
4. Refresh modern slavery training for the central procurement team, annually
5. Increase procurement resource to include Sustainable Procurement Partner.

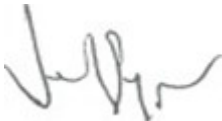
We will continue to build awareness and knowledge across all areas of the University through information and training initiatives and review all University-wide policies to ensure compliance with the Act. We will examine modern slavery and human trafficking awareness in our student population and explore self-evaluation and assessment techniques to help identify risks. We will look at how we can integrate best practice to improve awareness within our supply chains.

### In Summary

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, or across our services.

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 July 2024.**

Date statement approved	October 2024
Final Approval by	Chair of Council
Date of review of statement	August 2025



Jenny Pyper  
Chair of Council

For and on behalf of Ulster University

Further information and contact: Clare Egan, Head of Procurement, [cm.egan@ulster.ac.uk](mailto:cm.egan@ulster.ac.uk)