

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

The enactment of The Modern Slavery Act into UK law during March 2015 was a pivotal milestone in fulfilling the aims and aspirations to combat Slavery and Human Trafficking here in the UK. The legislation provided authorities and other agencies the legal power and framework required to offer protection and criminal consequences for people seeking to exploit others. The Act and its enforcement are a key pillar for building the structure for social justice within our society. This Statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes De Montfort University's Slavery and Human Trafficking Statement for the financial year ending 31 July 2025.

This Statement details De Montfort University's response to the Modern Slavery Act 2015 and offers an outline of key areas where Slavery and Human Trafficking are deemed a higher risk area for potential prevalence within the University's supply chain.

Organisational Structure

De Montfort University (DMU) is a Higher Education Corporation established in accordance with the Education Reform Act 1988. We are a provider of education and research services and during 2024/5 comprised four academic faculties:

- Business and Law (BAL),
- Health and Life Sciences (HLS),
- Computing, Engineering and Media (CEM),
- Arts, Design and Humanities (ADH),

together with a number of professional services directorates. Effective from 1 September 2025, the CEM and ADH faculties are being merged into a new Faculty of Technology, Arts and Culture (TAC).

We have a global annual turnover of £254 million¹.

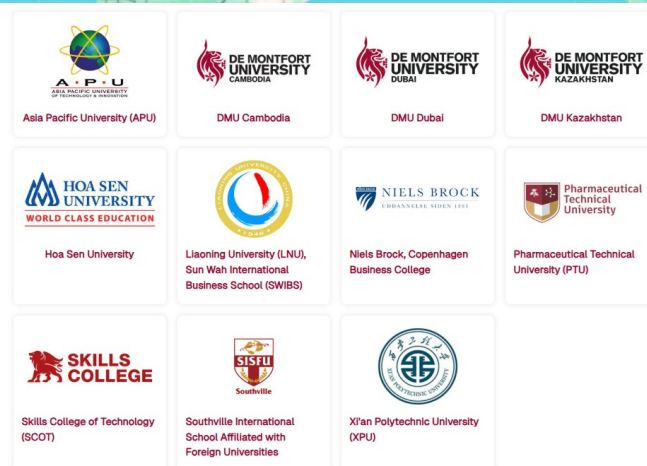
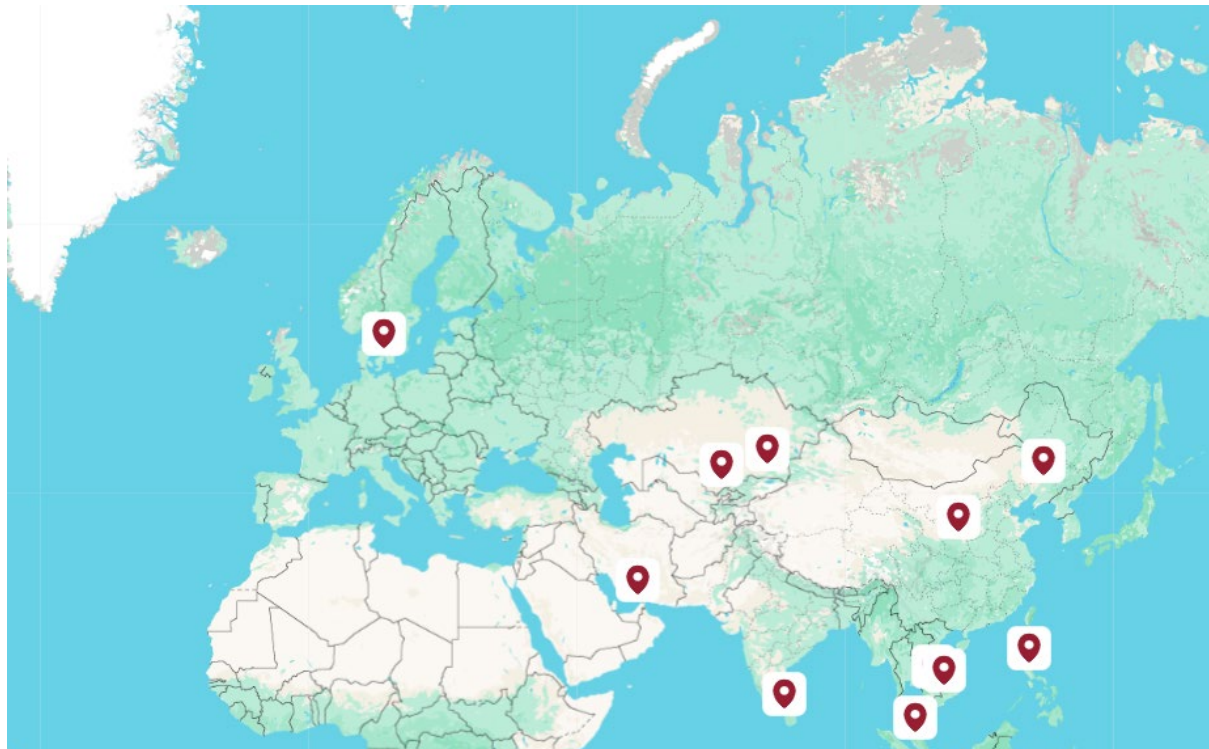
The University also has two subsidiary companies:

- De Montfort Expertise Limited, through which its commercial activities are provided; and
- Innovative Education Partnerships Limited, which supports its new DMU London campus.

DMU has a well-established and expansive Transnational Education (TNE) portfolio, reflecting its commitment to global engagement and academic excellence. Since 1993, DMU has developed a wide range of international partnerships, enabling over 10,000 students worldwide to study for a DMU qualification. The university operates overseas campuses in Dubai, Kazakhstan, and Cambodia, and offers dual award programmes in Malaysia and China. Its collaborative network includes long-standing partnerships with institutions such as Niels Brock Business College in Denmark, Liaoning University in China, Hoa Sen University in Vietnam, and Southville International School in the

¹ DMU Income and Expenditure Account from the Annual Accounts 2024/25

Philippines. DMU also maintains over 100 progression and articulation agreements globally, supporting student mobility and academic progression. These partnerships span diverse regions including Sri Lanka, Hong Kong, and the Philippines, and are supported by the Global Partnerships Unit, which fosters sustainable, high-quality academic collaborations that go beyond teaching to include research, volunteering, and cultural exchange.

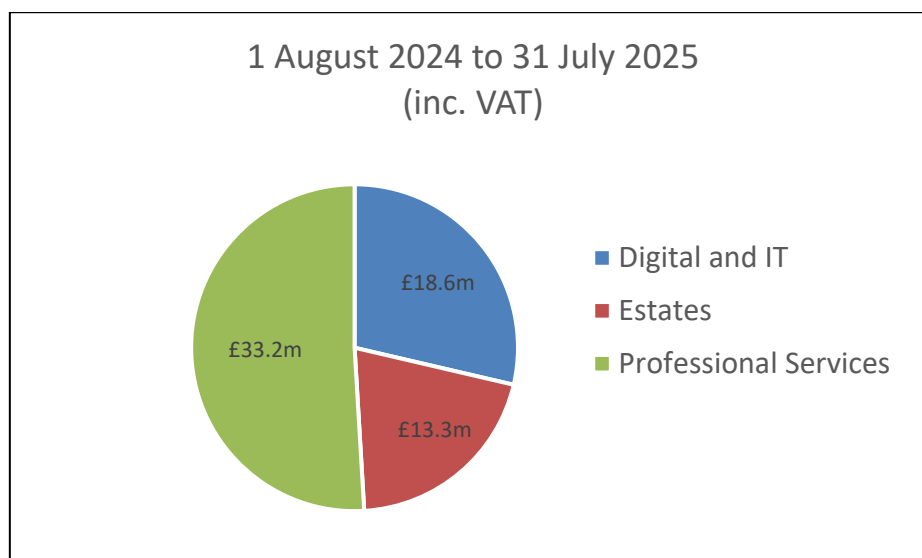


Our supply chains

DMU's supply chain comprises a wide and diverse range of suppliers from across the globe. These include providers of goods and services that directly support research and teaching activities, such as laboratory equipment and consumables, as well as suppliers of indirect goods and services.

The University's supply chains are in the main captured within the following high-level category groupings:

- Estates
- Digital and ICT
- Professional Services



These category groups are broken down into the following sub-categories:

Digital and ICT	Professional Services	Estates
AV and Related Equipment	Audit	Catering, Food and Beverages
IT Consultancy	Banking	Cleaning Services and Supplies
IT Hardware	Consultancy (exc. IT/Estates)	Estates and Buildings Construction and Maintenance
IT Services	Health and Welfare	Estates Consultancy
IT Software	Insurance	Furnishings
Printing, Reprographics and Photocopying	International	Postal Equipment and Services
Telecoms	Marketing and Communications	Safety and Security
IT Peripherals and Consumables	Other Professional Services	Utilities
Library Services and Publications	Staff Recruitment and Temporary Staffing	Art and Design Equipment
Photographic Equipment	Student Recruitment	Clothing and PPE
	Training	Laboratory and Medical
	Travel and Accommodation (Staff and Student)	Sport & Recreation Services and Equipment
	Promotional Activity and Materials	Vehicles and Fleet
	Stationery and Office Supplies	
	Tail Spend	

Each of the category groups above have been considered and the following specific categories have been identified as having a higher potential susceptibility to Modern Slavery and Human Trafficking occurrence.

- Construction works including any sub-contractors and supply chains;
- Estates; hard and soft facilities management services (such as maintenance, cleaning and security services);
- Food and catering;
- ICT and Audio Visual (AV) equipment and products;
- Laboratory and Personal Protective Equipment (PPE) supplies;
- Clothing (promotional, sportswear and workwear).

Most of the University's demand for office supplies and laboratory consumables is fulfilled by means of using national and regional agreements made available by the Higher Education purchasing consortia. A wide range of products are procured across all these categories, many of which are sourced from international manufacturers operating in low-cost countries where modern forms of slavery are prevalent. The consortia request many of the suppliers in these high-risk areas that they commit to the Base Code of the Ethical Trading Initiative (ETI) and are working to persuade all suppliers in these categories to commit to the Base Code.

A significant proportion of the University's demand for ICT equipment and products, including parts and accessories is also fulfilled by means of using national and regional agreements established by the HE purchasing consortia and Crown Commercial Service. The principal consortia utilised by the University for such procurements, including CCS (Crown Commercial Service), the SUPC (Southern Universities Procurement Consortium) and many others all have anti-slavery statements in place, as recommended by Electronics Watch. Where DMU puts in place call-off arrangements from such frameworks, it will as standard take full account of the issue of modern slavery as part of any final award decision and apply any relevant framework provisions in this respect as part of the call-off arrangement.

In respect of Security Services, we require our Security Contractors to be fully compliant with the Private Security Industry Act 2001 and have either ISO 9001 and/or the Approved Contractor Scheme. Any labour provision or sub-contracting must be disclosed to the University. Checks will be completed by the University to confirm and ensure expected and required accreditation and practice.

Our policies on slavery and human trafficking

We are committed to avoiding and preventing modern slavery and human trafficking in our supply chains or in any part of our business. We have employment policies in place and codes of conduct, which have relevance to how this issue is addressed within our business by members of our staff.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free, we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

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 mitigate the risk of slavery and human trafficking taking place within the University in or our supply chains.

The University is continually working to improve its controls. Ensuring clear reference to modern slavery and human trafficking commitments within our procurement policies and procedures as well as the use of Crown Commercial Services standard documents to undertake supplier selection – our supplier selection documents are under review following the introduction of the Procurement Act 2023.

The procurement function collaborates and shares best knowledge and practice with procurement representatives from other universities and public sector bodies.

We have HR guidance in place for recruiting departments covering the following areas:

- ID and other documents: original documents must be seen as part of the Right to Work (RTW) or checked using our IDVT (identification document validation technology) and other pre-employment checks are performed;
- ensuring that all individuals are fairly and appropriately remunerated for the work they undertake – we operate under a Starting Salary Policy, which outlines the principles and procedures for determining initial pay levels;
- the University is actively working to address and reduce pay gaps across the institution.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk, we have systems in place to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Protect whistle blowers.

DMU employs approximately 3000 staff (2500 FTE) from over 100 countries. Around 2% of our workforce is permanently based outside the UK. In addition to the policies and procedures referenced throughout this statement, the University offers a range of wellbeing policies to support its employees.

Risk assessment and management

We have a zero-tolerance approach to slavery and human trafficking. To ensure that all suppliers and contractors in our supply chain comply with our values we have the following procedures in place:

- a. We have a procurement policy, which forms part of the University's Financial Regulations approved by the University's Finance and Performance Committee, and which all staff at the University are obliged to follow. This policy is supported by a range of documented procedures, template documents,

checklists and procurement guidance which include key content supporting management of the risks relating to modern slavery and human trafficking.

- b. Robust controls are in place within policies and procedures, which ensure that the tendering process for new suppliers and contractors includes the provision and subsequent monitoring of compliance with the university's policies, including policies relating to slavery and human trafficking. Our supplier selection questionnaire also includes two declarations developed by Crown Commercial Services relating to the Modern Slavery Act 2015.
- c. This is further supported by the University's terms and conditions of contract, which include provisions whereby contracts can be terminated should a contractor breach such policies.
- d. The provisions are also contained within HE purchasing consortia (and other including Crown Commercial Service) framework agreements used by the University. If the University wished to use a framework which did not contain such a protection, it would seek to include such a provision by negotiation.

The University maintains a suite of procurement templates that are reviewed and updated regularly in collaboration with key stakeholders to ensure they remain fit for purpose and reflect current best practice. These templates are designed to support robust contract management by business areas and contract owners.

As part of this framework, dedicated templates for Service Level Agreements (SLAs) and contract review meetings have been developed. These tools promote consistency in how staff identify, assess, and address risks related to modern slavery and human trafficking throughout the contract lifecycle. This structured approach underpins the University's commitment to ethical procurement and enhances accountability across its supply chains.

Training

The Procurement Team offers a range of training material for the core procurement team and key internal stakeholders (such as those managing supplier relationships). This currently includes seven online higher education sector e-learning modules including (i) a guide to modern slavery and (ii) protecting human rights in the supply chain, alongside a range of broad courses to upskill procurers and contract managers and content from other organisations such as Government Commercial College's certified e-learning modules². Early reference to the right materials and content is key to ensuring that modern slavery risks are effectively identified and mitigated.

The University's approach reflects best practice as outlined in PPN 009³, which mandates risk-based assessments and enhanced due diligence for high-risk procurements. Staff are empowered to apply modern slavery risk criteria, conduct supply chain mapping, and engage suppliers in continuous improvement activities.

² [The Official Procurement Act 2023 learning modules - GOV.UK](#)

³ [2025-04-11 PPN 009 Tackling Modern Slavery in Supply Chains .pdf](#)

Actions taken during the reporting year (2024/25)

As part of the implementation of the Procurement Act 2023, DMU has ensured that members of the Procurement Team are trained to the standards set out in the Transforming Public Procurement (TPP) framework. Staff are actively encouraged to attend free workshops and share their insights with colleagues and stakeholders to foster a culture of continuous learning and collaboration.

A Sustainable Procurement Strategy is established and helps procurers understand key priorities for the University when undertaking procurement activity, such as ethical sourcing and reducing modern slavery, and supporting them in understanding their obligations prior to awarding contracts. Nine performance measures are defined within this strategy, including one focussed on Modern Slavery.

Additionally, the University has continued to strengthen its commitment to social value through its ongoing partnership with the University of Leicester and Loughborough University, utilising the Social Value Portal to drive meaningful outcomes in procurement. A comprehensive set of 37 National Social Value Measures (TOMs) has been collaboratively agreed, providing a consistent framework for suppliers bidding on higher-value contracts. These measures are embedded into tender evaluations through incentivised weightings, ensuring that social value is a core component of procurement decision-making.

Notably, two of the agreed measures directly address the risks and impacts of modern slavery within supply chains:

- NT3d: No. of full time equivalent (FTE) employees hired on the contract that are survivors of modern slavery.
- NT43: Initiatives taken throughout the local and global supply chain to strengthen the identification, monitoring, and reduction of risks of modern slavery and unethical work practices occurring in relation to the contract (i.e., supply chain mapping, staff training, contract management).

Actions planned for the next reporting year (2025/26)

We will develop a new Contract Management Procedure, including clear consideration of Modern Slavery, proportionate to the subject of the contract. This procedure will require Contract Managers to have appropriate training for the overall tier and specific risks of the contract to ensure that those involved in managing critical contracts are equipped with the necessary skills and knowledge to uphold best practice standards.

We will review our procurement procedures and policies, following the introduction of the Procurement Act 2023 and the University's updated Procurement Policy and ensure that Modern Slavery is re-embedded in these documents in a stronger and co-ordinated way and covered appropriately in training and communications as these updates are rolled out.

We will develop and strengthen our use of the Social Value Portal to be used for appropriate procurement exercises exceeding £100,000 (inc. VAT). As part of this, we

will undertake a strategic review of our Social Value Themes, Outcomes, and Measures to ensure stronger alignment with institutional priorities and to maximise the positive impact of procurement activities.

We will hold our contracted suppliers accountable for delivering the social value commitments outlined in their tender submissions, with a clear emphasis on evidencing impact through the Social Value Portal. This mechanism ensures transparency and drives continuous improvement in supplier performance against agreed social value outcomes.

We will draft a new Procurement Strategy to replace the now-expired Procurement Strategy and existing Sustainable Procurement Strategy and ensure Modern Slavery is maintained as key value for DMU.

As approved by the Board of Governors on (date): 11 December 2025

Signed by

A handwritten signature in black ink, appearing to read 'Ian Squires', with a horizontal line underneath.

Ian Squires
Chair of the Board of Governors
De Montfort University