

Anti-Slavery Statement

Financial Year Ending in June 2023

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Introduction

1. This statement is made pursuant to Section 54(1) of the [Modern Slavery Act 2015](#) and constitutes Northeastern University – London’s (the University’s) Anti-Slavery Statement for the financial year ending June 2023.
2. It sets out the steps the University has taken and plans to take in relation to modern slavery and human trafficking in our supply chains and across its operational and teaching activities.

University Overview and Governance Structure

3. The University is a private company limited by shares, 100% of which are owned by Northeastern University, a private US university, based in Boston, Massachusetts. The University is registered with the [Office for Students](#) and offers academically challenging undergraduate, postgraduate and apprenticeship programmes.
4. Northeastern University – London is registered with the [Charity Commission for England and Wales](#) (charity number: 1189858) and receives funding from multiple sources to support its activities.
5. [Northeastern London Board](#) is the statutory board of the legal entity (Northeastern University – London) that owns the brand ‘Northeastern University London’ and through which the University operates, including its relationship with regulatory bodies and partner organisations. Northeastern London Board is a limited liability company established under English and Welsh law.
6. The University benefits from robust, transparent governance processes. Further information on the University’s organisational governance and structure is available on the University’s [website](#).
7. The University’s campus is in central London in buildings leased from institutional landlords.

Areas of Risk

8. University operations give rise to two main risks:
 - 8.1. People, including students and staff that study or work at the institution from a wide range of countries.
 - 8.2. Supply chain, across a broad spectrum of goods and services.

9. The University has stringent recruitment policies and procedures in place as well as strict admissions policies to support students and members of staff.
10. In relation to supply chains, products and services are procured in accordance with public procurement law and our [Ethical Sourcing Policy](#), including:
 - 10.1. Construction services and supplies
 - 10.2. Furniture and stationery
 - 10.3. Electronics (computers, audio visual equipment, phones etc.)
 - 10.4. Food and catering supplies
 - 10.5. Travel services
 - 10.6. Laboratory supplies
 - 10.7. Estates and buildings
 - 10.8. Books and printing
11. The University considers these areas to be low risk, as the number of suppliers is relatively small and many are shared with its parent [Northeastern University](#) or through recognised suppliers to the UK higher education sector as a whole.

Policies and Procedures

12. The University is committed to ensuring that there is no modern slavery or human trafficking in its supply chain or in any part of its operations. The University's [Modern Slavery Policy](#) reflects its commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place in its supply chain or operations.
13. The University has in place the following policies and procedures to support staff in carrying out duties that are subject to this obligation:
 - 13.1. Human Resources Policies: These set out the rights for employees and contracted workers at the University that protect people from unfair treatment, and promote both a fair workplace and recruitment procedures that are in line with UK employment law.
 - 13.2. [Risk Management Strategy](#): This is designed to support the assessment and management of risks to the University pursuing its Mission, and to ensure that the University protects

its stakeholders, such as students, staff, funding bodies, partners, suppliers, and the general public.

13.3. [Public Interest Disclosure \(Whistleblowing\) Policy](#): This sets out how the University complies with the [Public Interest Disclosure Act 1998](#), to ensure legal protection to workers against being dismissed or suffering other detriment as a consequence of raising concerns professionally which they believe indicate malpractice within the organisation, including in relation to this area.

13.4. [Ethical Sourcing Policy](#): This sets out the University's commitments as laid out in its [Terms of Reference – Sustainability Committee](#) to apply its environmental and socio-economic policies at all stages of purchasing.

Training

14. Training on the University's [Modern Slavery Policy](#), and about the risks the University faces from modern slavery in its supply chains, will be provided at induction and will include actions to be followed to mitigate these risks.
15. Procurement staff will be required to complete ethics training annually.

Due Diligence Processes

16. The University continues to develop the following due diligence processes to reduce the risk of modern slavery and human trafficking in business and supply chains:
 - 16.1. Standardise the University's approach to modern slavery.
 - 16.2. Integrate modern slavery due diligence into contract management activities.
 - 16.3. Promote awareness of the risk of modern slavery and the importance of transparency of supply chains across the University.
 - 16.4. Raise awareness of the University's Anti-Slavery Declaration contained in the [Modern Slavery Policy](#).
 - 16.5. Identify, monitor, and mitigate potential risks in business and supply chains.

Performance Indicators

17. Throughout the upcoming financial year, the University will aim to achieve the following:
 - 17.1. Improved due diligence regarding procurement of goods and services.
 - 17.2. Enhanced policies associated with key risk areas.
 - 17.3. Enhanced supply chain mapping.
 - 17.4. Further development of processes in support of the University's supply chain management policies.
 - 17.5. Enhanced training opportunities for staff and suppliers.
18. The University's zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.
19. The University will integrate anti-modern slavery controls into its terms and conditions for all purchase contracts.
20. The University will request information from suppliers about their adherence to the [Modern Slavery Act](#).

This statement was approved by Northeastern London Board of Governors on 18 April 2024, will be reviewed at least annually, and is published on the University's [website](#).

Signed:

A handwritten signature in black ink, appearing to be 'A. F. ...', written over a light blue horizontal line.

Dated: 30th April 2024

Version History

Title: Anti-Slavery Statement				
Approved by: Northeastern London Board of Governors				
Location: Academic Handbook/ Policies and Procedures				
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22.1.0	April 2024	April 2024	CEO	April 2025
Referenced documents	Ethical Sourcing Policy; Financial Management Strategy; Modern Slavery Policy; Public Interest Disclosure (Whistleblowing) Policy; Risk Management Strategy.			
External Reference Point(s)	Modern Slavery Act 2015.			