



University of  
Nottingham  
UK | CHINA | MALAYSIA

# Modern Slavery Act 2015: Annual statement 2025

Reporting period August 2024  
to July 2025



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# Introduction

The University of Nottingham, UK (‘the university’) is committed to combatting modern slavery and human trafficking. This annual statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes the university’s modern slavery and human trafficking statement for the financial year ending 31 July 2025.

It summarises the university’s structures, processes, recent actions and future plans linked to the key modern slavery themes of:

1. organisational structure
2. ongoing activities to monitor and engage with our supply chains on this topic
3. actions to review and refine relevant policies, due diligence and compliance processes in relation to slavery and human trafficking
4. the steps we’ve taken in the last year against previously noted modern slavery commitments (and their effectiveness and results)
5. updates on our staff training related to modern slavery and trafficking

The activities outlined in this report cover the period August 2024 – July 2025 (aligned with the university’s financial year).

Following the launch of new statutory guidance on Transparency in Supply Chains (TISC) from the Home Office in March 2025, the University of Nottingham will ensure that level 1 and level 2 disclosures are incorporated into our modern slavery dashboard, reporting and statement accordingly for 2025/26.

**At the University of Nottingham, we solve hard problems and improve lives.**

## Organisational structure

The university has gained an outstanding international reputation for its world-class teaching and research. The university employs around 9,000 staff, across five faculties containing 27 schools and departments supported by 16 professional services departments. The five faculties are: Arts, Engineering, Medicine and Health Sciences, Science, and Social Sciences. The university is home to the Rights Lab: the largest group of modern slavery scholars in the world, and home to the world’s leading academic experts on modern slavery.

The university is a corporation formed by Royal Charter and holds charitable status. Two main bodies are involved in the governance of the university, the Council and the Senate. At the head of the university is the Vice-Chancellor and President. The day-to-day management of the university is the responsibility of University Executive Board (UEB).

# Our supply chains

The university purchases goods, services and works from a diverse range of suppliers, across a number of categories. The university’s supply chains are global and complex, therefore the university’s procurement functions have utilised the expertise of the Rights Lab to identify the highest risk areas within these categories of spend. This joint approach helps inform both the prioritisation and risk impact as the university continues to develop its due diligence processes.

The university recognises modern slavery risks are present throughout the contracting lifecycle and has therefore embedded due diligence into its contract and supplier management programme. The university also undertakes a significant amount of collaborative work with research partners and this area has been included as part of the university’s approach when adopting due diligence processes in relation to its obligations under the Modern Slavery Act (MSA) 2015.

Further details of recent actions and future commitments are detailed throughout this statement.

## Our modern slavery policy

The university is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business.

The university’s original Modern Slavery and Human Trafficking Policy was drafted in 2015 to reflect 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.

In 2025, the university’s Modern Slavery Act Working Group reviewed the UoN Modern Slavery and Human Trafficking Policy to ensure it was fit for purpose and aligned with our 38-step Slavery-Free Campus Blueprint (see Appendix 1). Led by the university’s Assurance and Legal teams, the policy published in 2025 provides greater clarity on roles and responsibilities for employees across the university at all levels. It is explicit in communicating the required actions and provides links to existing guidance and support to ensure employees have all the information they need to support understanding and compliance.

Employs around **9,000** staff (UK)

Total income  
**£849.4m**  
(2023–24)

Operating expenses  
**£323.8m**  
(Spend outside of pay 2023-24)

# University of Nottingham's Modern Slavery Act Working Group

## Five years on: our steps towards a Slavery-Free Campus

In 2020 the university began designing and testing an internationally pioneering, 38-step Blueprint to achieving a Slavery-Free Campus (Appendix 1). Commissioned and led in its development by the University's Modern Slavery Act Working Group, and based on ongoing research led by the university's world-leading Rights Lab, the Blueprint provides a guide for all universities to take action towards becoming slavery free. This ambitious, transformational, social value initiative was the first of its kind globally and remains closely aligned with the principles of the Modern Slavery Act 2015. After a year of implementation testing, our approach was launched publicly in July 2021 by the university's Chancellor, Baroness Lola Young.

The Blueprint continues to enjoy strong University Executive Board sponsorship and Council endorsement. It continues to form the basis of our work to tackle modern slavery risk in our operations and supply chains, and to shape the vision, progress and reporting of our Working Group, both in this Modern Slavery Statement and our wider communications.

In 2025, the activities of the Working Group were featured in the university's Sustainable Development Goal profile. The university's work to embed action against modern slavery into its policies and practices was then reflected in its high ranking for UN Sustainable Development Goal (SDG) 8 (Decent Work, including ending modern slavery) in the *Times Higher Education* Impact Rankings 2025, which are the only global performance tables that assess universities against the SDGs. We are proud to be recognised among the world's top higher education institutions for our efforts to create a Slavery-Free Campus.

The university is proud to be an active, global leader in helping deliver the vision of a slavery-free campus whilst also informing the approach taken by other public sector organisations and companies by leveraging our in-house expertise.



# Our commitments and actions (financial year 2024-25)

In its previous Modern Slavery Statement, the university laid out a series of commitments and goals as we continue our journey towards a slavery-free campus. This section of the report lists these previous goals / commitments and updates on the progress we have made (including evidence of impact or effectiveness wherever possible).

These commitments, and associated progress updates, are presented against the six sections used in last year’s report. Each section represents a key workstream for the university’s Modern Slavery Act Working Group. Each workstream has a mission statement, which we also include in this report.

- Governance
  - Training and awareness
  - Research and innovation
- Managing risk in the supply chain
  - Students
  - Civic engagement

## Governance



### Workstream mission statement

The University of Nottingham is committed to combatting modern slavery and human trafficking. Whilst the majority of the research and impact work related to this subject is delivered by the university’s Rights Lab, the Modern Slavery Act Working Group is the mechanism that ensures the key functions and elements of the university are joined up, where required, to address relevant issues, and that the legal requirement to produce an annual statement, pursuant to Section 54 of the Modern Slavery Act 2015, is met.

Workstream 1 (Governance) monitors the structure and operation of the Working Group and ensures timely reviews / updates / refinements of relevant university policy and processes.

**Key internal stakeholders:** UEB; Legal; Governance and Assurance; HR

**Current workstream lead:** Chair of Modern Slavery Act Working Group (Rosalie Parkin)

**We have continued to strengthen our governance around modern slavery risk mitigation and reporting at the university, including the addition of new members to the Modern Slavery Act Working Group in 2024-25. We continue to have strong sponsorship from our University Executive Board and our Chancellor for this work. This year we achieved the following:**

### Our commitments

- ✓ 1. Expand our engagement with internal and external stakeholders to support our anti-slavery goals with a specific focus on key subsidiaries.
- ✓ 2. Review and refine university policies and procedures (including reporting mechanisms and visibility of key information).



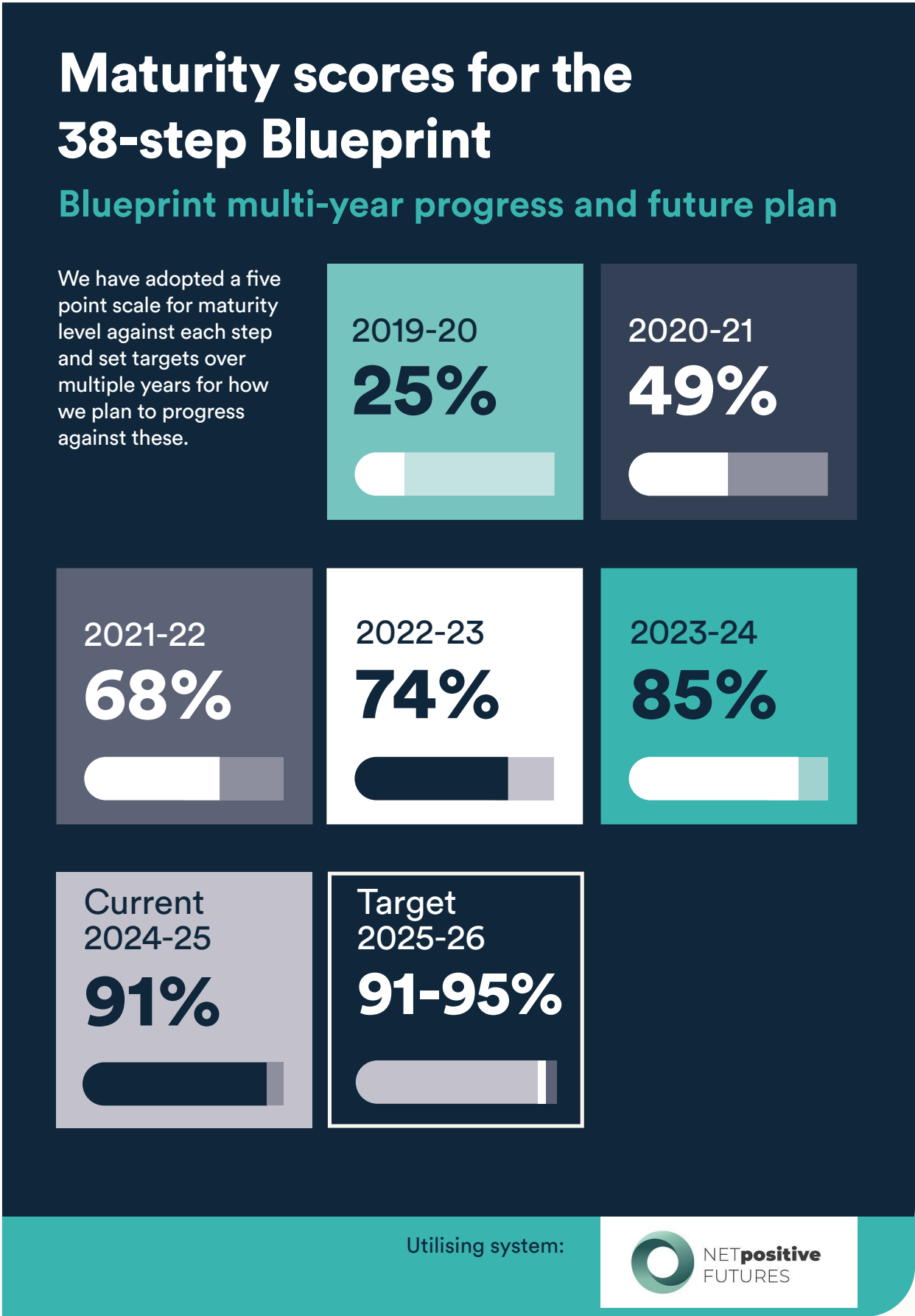
- ✓ 3. Investigate how to incorporate modern slavery requirements into the development of the university's new HR, Finance and Procurement system (Unicore) that is due to go live in the coming year and will support our anti-slavery work.
- ✓ 4. Incorporate the risk assessment results and associated recommendations from the recent comprehensive assessment of the university's modern slavery risks via the Rights Lab's modern slavery risk assessment tool into 2024-25 improvement action planning.

## Our actions

- ✓ 1. The Modern Slavery Act Working Group reviewed UoN subsidiaries to establish that none are required to submit a Modern Slavery Statement (as none have a turnover of £36m+), but to begin nonetheless establishing the due diligence policies and processes of those subsidiaries. This builds on our work in 2023-24 that supported Nottingham Venues Ltd to make significant updates to its modern slavery policy, modern slavery risk assessment, modern slavery training and Modern Slavery Statement. A key opportunity has been identified to work more closely with Nottingham Technology Ventures (NTV) Ltd, a wholly owned subsidiary of the University of Nottingham that advises on the formation of spin-out companies and the management of the university's spin-out company portfolio, and the Working Group has met with the NTV director to discuss risk assessment tools.
- ✓ 2. In 2025, the university's Modern Slavery Act Working Group reviewed the university's Modern Slavery and Human Trafficking Policy to ensure it was fit for purpose and aligned with the 38 step Slavery-Free Campus Blueprint (see Appendix 1). Led by the university's Assurance and Legal teams, the policy published in 2025 provides greater clarity on roles and responsibilities for employees across the university at all levels. It is explicit in communicating the required actions and provides links to existing guidance and support to ensure employees have all the information they need to support understanding and compliance.
- ✓ 3. Following the launch of the university's new HR, finance and procurement system (Unicore) in November 2024, the procurement team explored how to populate specific risks associated with contracts and suppliers to enable richer reporting across a broader range of suppliers within the supply chain.
- ✓ 4. The Modern Slavery Act Working Group reviewed the recommendations from the Rights Lab's recent assessment of the university's modern slavery supply chain risks and focused on that report's recommendation of 'extending due diligence for the supply chain beyond sourcing' for 2024-25 improvement action planning. As a result of this review, all new suppliers (regardless of value) are requested to agree to the University of Nottingham's Supplier Code of Conduct.



Figure 1: Blueprint maturity score as part of Modern Slavery dashboard





# Training and awareness



## Workstream mission statement

The University of Nottingham is committed to fostering a workplace culture that actively recognise, prevents and combats modern slavery. As a part of this commitment, we aim to ensure that our staff are fully informed about modern slavery issues and the university's zero-tolerance approach to modern slavery. Our comprehensive and engaging training module, an essential part of our mandatory statutory training programme, provides employees with the knowledge and tools they need to understand, identify potential signs, and take appropriate action.

Workstream 2 (Training and awareness) recognises that combating modern slavery is our collective responsibility and works across faculties and departments to ensure all our staff are aware of modern slavery risks and how to respond.

**Key internal stakeholders:** HR; Legal; External Relations; Rights Lab

**Current workstream lead:** HR Specialist (Emilia Moroz)

**We have continued to develop our awareness and training programme in new ways, including with the launch of a new e-learning module for all staff. This year we achieved the following:**

## Our commitments

- ✓ 1. Work with relevant colleagues across the university to evolve our staff training offer on modern slavery into a new e-learning module that is required for all staff. Monitor and report on engagement.
- ✓ 2. Communicate internally to increase awareness and engagement with our work and publish an annual Campus News update on progress against the Blueprint.
- ✓ 3. Identify scope for supporting degree programmes to enhance student education and training on modern slavery, with a particular focus on professional degree programmes.
- ✓ 4. Host student placements on the topic of modern slavery (in order to educate and engage across the student population beyond normal teaching activities).
- ✓ 5. Work in partnership with relevant units across the university to ensure safeguarding procedures and training cover potential student exploitation.

## Our actions

- ✓ 1. We launched the new staff training offer on modern slavery. Designed with expertise from the Rights Lab and our HR team, this eLearning offer is delivered through the new HR, finance and procurement system, Unicore, and allows enhanced tracking of staff engagement and compliance with this requirement.
- ✓ 2. We published internal communications in 2025 to inform all staff across the university about both the new Modern Slavery Policy and the new mandatory training available through Unicore. A further internal publication will follow the release of the annual statement to confirm our progress against the 38-step blueprint (now at 91% completion).

- ✓ 3. In support of the goal to ensure education and training on modern slavery is part of professional/practitioner degree programmes at the University of Nottingham, staff members delivered modern slavery content to Business School students within a course on Business, Human Rights and Sustainable Development; and to Health Sciences students within the School's three degree programmes (Nursing, Midwifery, Physiotherapy and Sport Rehabilitation). The School of Sociology and Social Policy's Social Work Programme delivered its Continuing Professional Development open programme for social workers (for all levels and experience, including family support and preventative services), a series of full day courses including content on the subareas within modern slavery of forced marriage and child sexual exploitation.
- ✓ 4. The university's Rights Lab hosted 15+ students during 2024-25 for placements that focused on a range of modern slavery topics, including work on supply chains, business standards and legislation. These placements developed new skills, knowledge and interests.
- ✓ 5. We ensured and confirmed that modern slavery and exploitation is covered on all staff safeguarding training.

## Research and innovation



### Workstream mission statement

We aim to ensure that our researchers and staff are aware and mindful of the Modern Slavery Act and any potential implications or interactions our research and commercialisation work may have, across the university and with partner institutions nationally and internationally.

Workstream 3 (Research and innovation) focuses on reducing modern slavery risks in research partnerships and funding.

**Key internal stakeholders:** Global Engagement; Research and Knowledge Exchange Development Network (PM-RDN); Research and Innovation (R&I) Contracts and Research Operations teams

**Current workstream lead:** Strategic Lead: International, Research and Innovation (Dr Maeve Fitzpatrick)

**We have continued to strengthen our approach to research and innovation contracting and partnerships with regard to modern slavery risks, including work to review contract clauses and work by our Trusted Research team on ensuring regulatory compliance. This year we achieved the following:**

### Our commitments

- ✓ 1. Continue to work within the UKRI trusted research framework with respect to validating and ensuring our international research collaborators adhere to the highest standards of ethics and governance and continue to clearly contract for adherence to UoN's modern slavery statement with our international research partners.
- ✓ 2. Review the current ethical fundraising policy on accepting gifts and donations in the context of modern slavery and update if required.

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- ✓ 3. Conduct a comprehensive review of modern slavery contract clauses and trusted research guidelines. This review aims to ensure that all aspects of modern slavery activities align with UoN and UK Government policies and embody the principles of collaborative, equitable and just international partnerships, free from any form of exploitation.
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- ✓ 4. To further ensure compliance and understanding of modern slavery obligations among our researchers and partners, we will include further specific reference to modern slavery requirement in our contracts training programs. This will focus on the aspects of the legal requirements within the research context.
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## Our actions

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- ✓ 1. We continued to work within the UKRI trusted research framework with respect to validating and ensuring our international research collaborators adhere to the highest standards of ethics and governance and continued to clearly contract for adherence to UoN's modern slavery statement with our international research partners.
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- ✓ 2. The Modern Slavery Act Working Group reviewed the university's Gift Acceptance Policy and Ethical Fundraising Practice to confirm that it requires, as part of due diligence checks, any organisations with an annual turnover of more than £36 million to have filed a Modern Slavery Statement, in accordance with the Modern Slavery Act 2015.
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- ✓ 3. The UoN Research Contracts Team has initiated a review of the modern slavery contract clauses and trusted research guidelines. This review aims to ensure that all aspects of modern slavery activities align with UoN and UK Government policies and that contracts reflect the principles of collaborative, equitable and just international partnerships that are free of exploitation of any nature. The review is taking place in conjunction with the central legal team and comprises a review of all legislative compliance requirements including: the Bribery Act 2010, the National Security and Investment Act 2021, the UK Government's Trusted Research guidance, and UKRI international regulatory requirements.
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- ✓ 4. To further ensure compliance and understanding of modern slavery obligations among our researchers and partners, we are working to include further specific reference to modern slavery requirements in our contracts training programme and also in our early research career training programme. This will focus on the aspects of the legal requirements within the research context.
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# Managing risk in the supply chain

## Workstream mission statement

Through our commitment to Responsible Procurement, we will ensure any new supplier approval processes are proportionate to the level of risk identified. We will implement our standards through the University code of conduct and continue to develop category specific criteria for the assessment of modern slavery in our tenders. We will implement appropriate KPIs and contractual conditions into our contracts to ensure risks are monitored regularly and acted upon decisively.

Workstream 4 (Managing risk in the supply chain) leads on improving the visibility of modern slavery risk in our supply chains and mitigating these risks through collaboration with university suppliers.

**Key internal stakeholders:** Procurement; Rights Lab; Legal; Governance and Assurance

**Current workstream lead:** Procurement Partner (Daniel Lang)

**We have continued to strengthen our approach to assessing and mitigating risks in the university's supply chains, and in the area of supplier engagement. This year we achieved the following:**

## Our commitments

- ✓ 1. Assess any changes from running our annual assessment on procurement spend relating to the distribution of risk in our supply chain. Build relevant data from this assessment into category strategies and resulting approved suppliers.
- ✓ 2. Assess the modern slavery risk for every new procurement using our in-house tool and track the risk profile of our activity via monthly KPIs alongside sustainability, EDI and social value as part of our commitment to conduct responsible procurement.
- ✓ 3. Continue to engage with Electronic Watch to assess the specific risk throughout their supply chain for laptops and desktops. This information will be used to help mitigate future risk when retendering this contract and address any actions that are recommended as part of the reports.
- ✓ 4. Ensure that Tier 1 strategic suppliers are onboarded into our Supplier Relationship Management programme with an understanding of our work on a Slavery-Free Campus, introduce our Code of Conduct and explore activities our suppliers are undertaking in the detection and prevention of modern slavery in their supply chains that we may collaborate on. In addition, ensure the remaining supply chain agree to the Code of Conduct and sign up to NetPositives so that resulting actions plans can be analysed and monitored.
- ✓ 5. Supplement our existing KPIs on modern slavery, sustainability, EDI and social value with richer data from our suppliers on risks and actions. This will allow the identification of focus areas where the university could provide further support to the supply base through education.

## Our actions

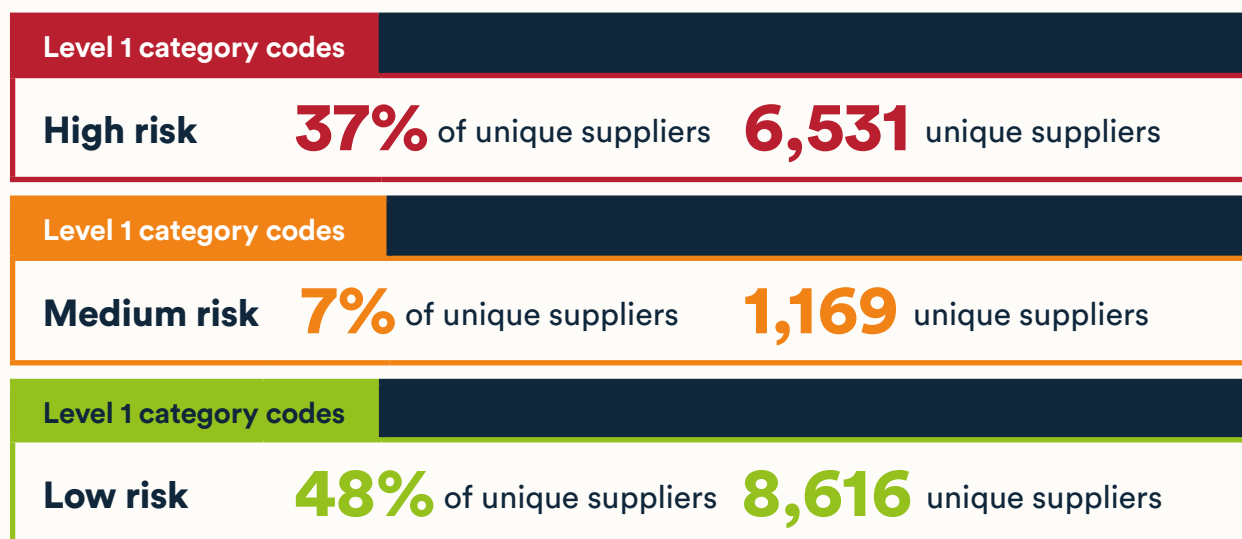
- ✓ 1. We ran our annual assessment on our procurement spend to understand the distribution of modern slavery risk in our supply chain and to inform where we should focus due diligence. Through extensive university spend analysis, the distribution of high, medium

and low risk areas for modern slavery was identified across our four procurement categories: Professional Services, Estates, Technical and Digital Technology Services (DTS). Further analysis of the supply chain data in relation to modern slavery risk was delivered to the Procurement Category Teams, to highlight which high risk categories the teams should incorporate into their strategies.

- ✓ 2. The Procurement team assessed each new procurement for modern slavery risk using our in-house tool and tracked the risk profile of our activity via monthly KPIs alongside sustainability, EDI and social value as part of our commitment to conduct responsible procurement. For example, “Ethical supply chain” is now incorporated into the university Sportswear tender, which assessed the processes, measures and due diligence the successful organisation will adopt to promote workers’ rights and to reduce the risk of human rights violations within their supply chain of garment manufacture.
- ✓ 3. The Procurement team continued to engage with Electronic Watch to assess the specific risk throughout their supply chain for laptops and desktops. This information was used to mitigate future risk when retendering this contract and address any actions that are recommended as part of the reports.
- ✓ 4. We onboarded 17 new Tier 1 strategic suppliers onto our Supplier Relationship Management programme, in which our work on a Slavery-Free Campus and Code of Conduct was introduced. The Supplier Code of Conduct was incorporated directly into our new Finance, Procurement and HR system (UniCore) for all new supplier requests and tenders. All new suppliers and prospective tenderers are now required to accept the Code of Conduct directly in UniCore enabling increased compliance and disclosure.
- ✓ 5. We supplemented our existing KPIs on modern slavery, sustainability, EDI and social value with richer data from our suppliers on risks and actions, and therefore improved our in-house Responsible Procurement Risk Tool for every new procurement. Improvements to the tool reflect the revised commodity codes being used alongside the new HR, Finance and Procurement system. We also used the recent updates to NetPositives to inform how we monitor supplier engagement.

**Figure 2: understanding our suppliers – a summary of the 17,872 sources of supply\* by category risk for Financial Year 2024-25.**

The university has observed a decrease of 3 % points in the use of high-risk sources of supply vs the financial year data shared in our previous (2024) Modern Slavery Statement.



\*Sources of supply is the number of unique suppliers per category code, per risk category. It is not the same as the total unique suppliers used by the university.



# Students



## Workstream mission statement

We aim to reduce risks to students around modern slavery and exploitation by promoting awareness through staff safeguarding training and student-focused campaigns. We build on robust monitoring processes to focus on potential risks to students through our central safeguarding reporting system.

Workstream 5 (Students) supports the university's goal of reducing potential risk to students and enabling swift safeguarding responses to any identified risks.

**Key internal stakeholders:** Student Union; Visa and Immigration Team; Student Wellbeing Team

**Current workstream lead:** Senior Manager for Safeguarding (Laura Sanderson)

**We continued to monitor the risk to students of exploitation, after noting GLAA reports in 2023 of exploitation risk for international students in the UK's residential care sector, for example. We continue to build on the work of the university's Student Wellbeing Team (including the Safeguarding Team) and the Students' Union (SU) to reduce risk to students. This year we achieved the following:**

## Our commitments

- ✓ 1. Create an actionable plan under the key areas outlined by an internal working paper produced by the SU that will form the basis of activities through FY24/25.
- ✓ 2. Continue to engage with the SU on modern slavery issues and risks under the three broad themes noted above: of identifying risks; raising awareness; and cross-team, proactive risk mitigation. Refine specific action plans and deliver initial actions.
- ✓ 3. Have a visible presence on the topic of modern slavery, trafficking and exploitation at the "Know Your Rights Fair" in October, part of the SU Freshers program.
- ✓ 4. Develop a suitable student-focused webpage with a QR code that can be distributed / highlighted at relevant student-facing events.
- ✓ 5. Host and disseminate any informational resources visible in the SU advice centre.
- ✓ 6. Monitor Report and Support for any potential modern slavery concerns about students.
- ✓ 7. Work with UoN Police Officers to ensure links with the Regional Lead are maintained and updates provided to our Safeguarding Leads.
- ✓ 8. Explore how our student engagement dashboard could flag concerns around student attendance on courses that may suggest a risk of modern slavery, linking closely with the Safeguarding (Report and Support) team.

## Our actions

- ✓ 1. We actioned a plan for exploitation risk, including verifying on-going processes within our Visa and Immigration Team to flag engagement concerns about international students and enable wellbeing checks, following the reports nationally by the GLAA in 2023 of trafficking and exploitation risks to international students in particular.



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- ✓ 2. The Report and Support Team had a very regular liaison with the SU on topics that included modern slavery risks, awareness and risk mitigation, including a weekly triage meeting to review data and shared actions.
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- ✓ 3. We shared information and guidance with students on the topic of modern slavery, trafficking and exploitation at the “Know Your Rights Fair” in October 2025, which is part of the SU Freshers program.
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- ✓ 4. We distributed new digital and physical resources around our UK campuses with information about modern slavery and all forms of exploitation, including a QR code for Report and Support.
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- ✓ 5. We hosted and disseminated relevant informational resources in the SU advice centre.
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- ✓ 6. The Report and Support team monitored Report and Support every working day, including the specific exploitation category. This monitoring is supported by oversight from the Safeguarding Steering Group. An annual report was published and shared with relevant data, safeguarding themes and developments within the university. The university continues to run due diligence on current student cohorts. This year our activity confirmed that there were no observed incidences of modern slavery among our student population.
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- ✓ 7. The Report and Support Team met regularly with UoN Police to ensure any safeguarding concerns were reviewed. Our Safeguarding Leads Network also recently received a training session on Modern Slavery and Exploitation from Police and City Council officers working in this area.
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- ✓ 8. We have clear processes in place for our Support and Wellbeing Service to follow up on concerns identified for the wider student population on our student engagement dashboard. The service team members are able to escalate any safeguarding concerns to the Report and Support Team for follow up.
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# Civic engagement



## Workstream mission statement

The University of Nottingham Modern Slavery Act Working Group aims to collaborate locally, including in the city of Nottingham, county of Nottinghamshire and across the East Midlands area, to exchange knowledge about tackling modern slavery risks, share best practices for creating slavery-free environments (cities, communities, campuses), and collaborate on local anti-slavery multisector partnership and project work.

Workstream 6 (Civic Engagement) supports the university’s civic ambitions, including to improve the levels of prosperity, opportunity, sustainability, health and wellbeing for local citizens, families and communities, through a specific focus on modern slavery engagement and knowledge exchange.

**Key internal stakeholders:** The Rights Lab; UoN Civic and Regional Committee; Universities for Nottingham; UoN Public Affairs Team

**Workstream lead:** Director of the Rights Lab (Professor Zoe Trodd)

**Through the work of the university’s Rights Lab and the Modern Slavery Act Working Group, we continue to drive our civic agenda and support partners and other organisations to build capability and approaches to understand and mitigate risk of modern slavery. This year we achieved the following:**

## Our commitments

- ✓ 1. Deliver talks and presentations locally and nationally, including on-going dissemination of the Slavery-Free Campus Blueprint as part of a wider engagement effort around the mission of universities in delivering progress on anti-slavery goals.
- ✓ 2. Participate in developing the first ISO (International Organisation for Standardisation) standard on modern slavery (building on the university’s previous work developing BS 25700).
- ✓ 3. Continue our involvement with and support for the Nottingham and Nottinghamshire Modern Slavery Partnership.
- ✓ 4. Continue to partner with Nottingham Trent University on local research into the lived experience of workplace coercion, exploitation and modern slavery in the community across Nottingham.
- ✓ 5. Identify opportunities to engage with the newly elected Nottinghamshire Police and Crime Commissioner on the topic of modern slavery locally.
- ✓ 6. Promote the adoption of modern slavery risk assessment and due diligence guidelines for the delivery of adult social care services among local authorities across England and Wales.

## Our actions

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- ✓ 1. University staff and students engaged widely across Nottinghamshire and the Midlands on the topic of modern slavery, including through a collaboration with the UK Independent Anti-Slavery Commissioner (IASC) to analyse the multiple overlapping vulnerabilities to modern slavery. This analysis by university students and the Rights Lab took Nottingham as a case study. It completed interviews with Nottingham's Slavery Exploitation Team (SET) based within Nottingham City Council, of modern slavery cases. It also analysed local cases, demographics and vulnerabilities of those referred, types of exploitation, housing status and risk assessment ratings across cases referred. The report, published by the IASC, recommended the city's multiagency approach to the management, prevention, and identification of modern slavery as best practice for the national response.
- 
- ✓ 2. To showcase and share local strengths, the Rights Lab ran a collaborative workshop on modern slavery and public policy responses for the national annual Leadership College for Government (LCG) programme "Leading Collaborative Organisations." Part of the Cabinet Office and the Government Skills and Curriculum Unit, the LCG equips public and civil service leaders with the skills, knowledge, and networks to solve today's most complex problems. The workshop was hosted at the university's campus for a national cohort of 50 public and civil service Chief Executives and Deputy Chief Executives.
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- ✓ 3. Business School Professor and Rights Lab Associate Director, Alex Trautrim, continues to chair the development of ISO/NP 37200 (Guidance for the prevention, identification and response to human trafficking, forced labour, and modern slavery). This follows his previous work developing BS 25700 (Organisational responses to modern slavery). ISO/NP 37200 will provide organisations with guidance for managing the risk of human trafficking, forced labour and modern slavery including prevention, identification, response, remediation, mitigation, and reporting in its operations, supply chains and its wider operating environment. The draft standard is now being reviewed by the committee.
- 
- ✓ 4. The university, via the Rights Lab, continued to work as part of the Nottingham and Nottinghamshire Modern Slavery Partnership. This local multi-sector group delivers annual awareness sessions and information and updates to front line staff and third sector organisations, as well as conducting intelligence sharing. Its membership also includes representatives from the City Council, County Council, Red Cross, HMRC, Fire Brigade, Chamber of Commerce, faith groups, the GLAA, Salvation Army, District Councils, DWP, OPCC, and Community Cohesion.





- ✓ 5. The university and the Rights Lab continue to partner with Nottingham Trent University and the GLAA on new local research about the lived experience of workplace coercion, exploitation and modern slavery in the community across Nottingham. This research is a funded PhD studentship with Co(l)laboratory, a pioneering eight-year project supported by Research England, Nottingham Trent University, the University of Nottingham and the Universities for Nottingham partnership. The PhD research project about the lived experience of labour market coercion, exploitation, and modern slavery, with an explicit emphasis on locally sourced and locally relevant research, has the potential to create meaningful change to better protect vulnerable workers and those affected by exploitative practices.
- ✓ 6. The Rights Lab developed and shared a briefing with the newly elected Police and Crime Commissioner (PCC), Mr Gary Godden, on known facts and statistics about modern slavery in Nottingham and efforts to address it, as well as a call for the PCC to make modern slavery a priority in the Police and Crime Plan. The campus visit of the Office of PCC and Nottinghamshire Police Chief Constable in October 2024 included a session about modern slavery, towards on-going support of the PCC's priorities in the new Police and Crime Plan 2025-29 to "further strengthen the partnership response to modern slavery and exploitation across Nottinghamshire" and to "tackle and disrupt serious and organised crime such as... human trafficking."
- ✓ 7. Modern slavery risk assessment and due diligence guidelines co-developed by university assistant professor Dr Caroline Emberson with three participating local authorities and sponsored by the English Local Government Association (LGA) were presented to leads at the LGA's Modern Slavery network and were used to improve modern slavery risk assessment and due diligence processes in Local Authorities across England and Wales and among regional commissioning boards, vulnerable people groups and the Care regulator, Social Care Wales, in Wales. Dr Emberson also designed a facilitated, creative group problem-solving approach for the generation of local action plans to address modern slavery risk. This approach was developed and tested among three local authorities. This novel approach empowered practitioners in the development of locally specific action plans to support the eradication of modern slavery.



# Our commitments for financial year 2025-26

The Working Group will continue to progress its work in the coming year with a particular focus on the following areas:

## Governance

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- 1. The Modern Slavery Act Working Group will review the new Transparency in Supply Chains (TISC) statutory guidance from the Home Office (new version launched on March 24, 2025, last updated July 30, 2025) and update our modern slavery dashboard, reporting and statement accordingly for 2025/26.
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- 2. We will focus in 2025-26 on ensuring that the new TISC guidance list of level 1 disclosures is met in full and detailed in plain language.
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- 3. We will assess all level 2 disclosures from the new TISC guidance and agree timescales for delivery.
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## Training and awareness

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- 1. We will work with relevant colleagues in HR to ensure that the university's modern slavery training is completed by individual staff members at the university. The HR team will monitor the engagement of staff members and feed back to the Modern Slavery Act Working Group on a regular basis.
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- 2. HR will increase individual engagement in the training via UoN communication channels, also highlighting the progress in training goals against the Slavery-Free Campus Blueprint steps.
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- 3. The Modern Slavery Act Working Group will collaborate with colleagues in HR to ensure that those responsible for recruitment and for responding to employee queries are aware of the university's Modern Slavery Policy and provided with relevant training to identify and take appropriate action in response to modern slavery risks.
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## Research and innovation

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- 1. We will continue to work within the UKRI trusted research framework with respect to validating and ensuring our international research collaborators adhere to the highest standards of ethics and governance and continue to clearly contract for adherence to UoN's modern slavery statement with our international research partners, including as new partners are added.
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- 2. Following the completion of a comprehensive review of contact clauses, we will ensure that all new contracts reflect modern slavery clauses aligned to UoN and UK government policy and reflect the principles of collaborative, equitable and just international partnerships that are free of exploitation of any nature.
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- 3. To further ensure compliance and understanding of modern slavery obligations among our researchers and partners, we will continue to include specific reference to modern slavery requirement in our contracts training programme, including aspects of the legal requirements as they apply to the research context.
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- 4. Research and Innovation colleagues will continue to support project PIs to manage any impacts and risks to fixed-term contracts and therefore job security of funding pauses and cuts due to the changes in US government research funding.
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## Managing risk in the supply chain

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- 1. We will run an annual assessment on our procurement spend to understand the distribution of risk in our supply chain and to inform where we should focus due diligence as part of our Responsible Procurement Risk Tool.
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- 2. We will incorporate strategies to mitigate high modern slavery risk into the overarching strategy for each of the four Procurement Category Teams: Professional Services, Estates, Technical and Digital Technology Services (DTS).
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- 3. We will identify specific risk areas and possible mitigations associated with the high risk area of garment manufacture, to inform the university's Staff and Student Uniforms tender and ongoing contract management.
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- 4. We will continue to engage with our Tier 1 suppliers about modern slavery as they are onboarded onto our Supplier Relationship Management programme or as part of ongoing reviews. We will outline to suppliers our work towards becoming a Slavery-Free Campus, introduce our Code of Conduct and explore activities they are undertaking in the detection and prevention of modern slavery.
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- 5. We will ensure that the remaining parts of the supply chain agree to the Code of Conduct and sign up to NetPositives so that resulting actions plans can be analysed and monitored.
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- 6. The Procurement team will assess the modern slavery risk of every new procurement using our in-house Responsible Procurement Risk Tool and will track the risk profile of our activity via monthly KPIs (alongside sustainability, EDI and social value), as part of our commitment to conduct responsible procurement.
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- 7. We will continue to supplement our existing KPIs on modern slavery, sustainability, EDI and social value with rich data from our suppliers on risks and actions, to allow the identification of focus areas where the university could provide further support to the supply base through education.
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- 8. The Procurement team will continue to engage with Electronics Watch and utilise audit reports to assess specific risks throughout the supply chain for laptops and desktop PCs. This information is being used to help mitigate future risk when re-tendering these contracts and address any actions that are recommended as part of the audit reports.
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- 9. We aim to better understand our labour supply chain structure for key contracts with a high risk of modern slavery by identifying how workers are recruited at different stages in the supply chain, the source and transit countries of migrant workers in the supply chain, and the involvement of agents, brokers and other labour intermediaries.
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- 10. We aim to make progress on mapping our indirect suppliers (i.e. subcontractors) down to the lowest tier of the supply chain (e.g. raw materials) for key contracts with a high risk of modern slavery.
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## Students

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- 1. The Report and Support Team will continue to liaise regularly with the SU on topics that included modern slavery risks, awareness and risk mitigation.
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- 2. We will continue to distribute new digital and physical resources around our UK campuses with information about modern slavery and all forms of exploitation, including a QR code for Report and Support.
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- 3. The Report and Support team will monitor Report and Support, including the specific exploitation category, supported by oversight from the Safeguarding Steering Group. An annual report will share relevant data, safeguarding themes and developments within the university.
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- 4. The Report and Support Team will meet regularly with UoN Police to ensure any safeguarding concerns are reviewed.
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- 5. The Support and Wellbeing Service will continue to follow up on concerns identified for the wider student population on our student engagement dashboard, with potential escalation of any safeguarding concerns to the Report and Support Team for follow up.
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- 6. We will add a specific information and resources 'tile' for modern slavery and exploitation to the Report and Support online platform, with additional specific advice and guidance created in collaboration with the Modern Slavery Act Working Group and the Rights Lab.

## Civic engagement

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- 1. We will deliver talks and presentations locally and nationally, including on-going dissemination of the Slavery-Free Campus Blueprint as part of a wider engagement effort around the mission of universities in delivering progress on anti-slavery goals.
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- 2. We will continue to participate in developing the first ISO (International Organisation for Standardisation) standard on modern slavery (building on the university's previous work developing BS 25700).
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- 3. We will continue our involvement with and support for the Nottingham and Nottinghamshire Modern Slavery Partnership.
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- 4. We will continue to partner with Nottingham Trent University on local research into the lived experience of workplace coercion, exploitation and modern slavery in the community across Nottingham.
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- 5. We will identify opportunities to engage as the government creates the Fair Work Agency, which going forward will include elements of the UK's response to modern slavery risk.
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- 6. We will identify opportunities to support the delivery of the UK Independent Anti-Slavery Commissioner's Strategic Plan, published in January 2025 and including a key aim of "improving our knowledge and understanding of modern slavery."

# Conclusions

The University of Nottingham, UK remains committed to combatting modern slavery and human trafficking. This statement has detailed how the university's structures, processes, recent actions directly address the government's key modern slavery themes as well as key commitments for the coming year. Measurable progress continues to be made on all key elements with the latest end-of-year analysis demonstrating a maturity score of 91% against the Slavery-Free Campus Blueprint originally published in 2021.

## University Executive Board and Council approval

This Statement was approved by the University of Nottingham Council on Monday 29 September 2025.



**President and Vice-Chancellor, Professor Jane Norman**

Date: Monday 29 September 2025



# Appendix 1 – 38 steps to a Slavery-Free Campus

## Take action for a Slavery-Free Campus – a Blueprint: 38 practical steps for universities to tackle modern slavery

Governance and management on campus	
Leadership	
<b>G1</b>	Assign accountability for addressing modern slavery and human trafficking to a Council or Board level.
<b>G2</b>	Form a Working Group to tackle modern slavery that includes staff from different and appropriate functions (for example, Procurement, HR, Estates). Assign operational responsibility/group leadership to an individual with the right skills, interests and influence.
<b>G3</b>	Working Group to discuss and initiate wider consultation on what the university wants to achieve in the area of preventing and ending modern slavery, for example, do we want to be a leader in our peer group, be a Slavery-Free Campus or meet basic legal and industry standards? Get agreement and commitment to university goals from Council/Board.
<b>G4</b>	Working Group to develop a map of the university's key internal and external stakeholders, including owned/partially owned subsidiaries and key partners, to understand who the university impacts through its operations and supply chain and who can support it in its antislavery goals. It is likely that all professional service departments will need to take responsibility for steps in the university's antislavery Blueprint (Estates/Facilities; Finance; Procurement; Human Resources; Governance; Research).
<b>G5</b>	Working Group to develop an implementation plan for how to achieve the university's goals, setting clear objectives over time with clear ownership and required resources.
<b>G6</b>	Working Group to develop a Modern Slavery Dashboard containing key indicators of performance for own operations and supply chain towards the university goals to manage progress. Also to consider how to track and evaluate the effectiveness of actions taken in response to human rights risks.
<b>G7</b>	Working Group to lead on regular short-term reviews of progress towards its goals and to inform the annual, legally-required review and update of each university's Modern Slavery Statement. This should include progress against key performance indicators and the year-on-year improvement plan across processes and systems plus future commitments. Internal audit involved to bring rigour and challenge to the programme, key risks should be added to the university Risk Register.
Policies	
<b>G8</b>	University Governance to develop a university Ethical Framework defining the ethical standards that the University sets across all of its activities. This covers stakeholder engagement, research, business operations, donations and governance. The Modern Slavery and Human Trafficking Policy within this blueprint should reflect the ambition of the university as determined in G3.

<b>G9</b>	University Finance to review approach to investment to ensure their ethical investment or responsible investment policies include modern slavery. Consider being signatories of the United Nations Principles of Responsible Investment.
<b>G10</b>	University research services and fundraising departments to ensure that policies on research partnerships (including industry partnerships) and donors include work to ensure the university is not sending or receiving funds to and from external organisations that do not have risk mitigation in place.
<b>G11</b>	University HR to ensure recruitment policies set out the requirement to be aware of modern slavery in recruiting staff, and that the university mitigates slavery risk through checks on right to work in the UK. This includes via third parties as well as direct recruitment.
<b>G12</b>	University Procurement policy to reflect focus and ambition on reducing modern slavery risk in the supply chain as part of corporate social responsibility (CSR) approach.
<b>Procedures and management</b>	
<b>G13</b>	University HR and Student Services to actively support the safe migration of staff and students respectively via appropriate advice and monitoring of visas.
<b>G14</b>	Working Group to support the university to map and review existing university procedures and ensure that modern slavery is referenced and staff, students, suppliers and partners understand what steps they are responsible for. This should include staff guidance, disciplinary procedures, induction and training, supplier social audit procedures and access to remedy arrangements.
<b>G15</b>	University HR to establish processes for recruiting staff which include recording: how the worker found out about the work, whether the worker has paid anyone or will have to pay anyone to obtain the work, whether the worker has paid anyone to get into the country, the worker's landlord's name and the worker's address.
<b>G16</b>	University HR to demonstrate that regular audits are conducted to check that good practice in identifying, deterring and tackling hidden labour exploitation is being consistently applied throughout the business. Establish regular checks of employees' and applicants' addresses for high occupancy of particular houses and act accordingly on the information. Check bank accounts to identify unrelated employees paid into one account; mobile phone numbers to identify seemingly unrelated employees who are contactable through one or sequential numbers; documents for the same next of kin and/or same place of origin/location in home country; emergency contact numbers to identify seemingly unrelated employees who are contactable through the same number. Act accordingly on the information for all these checks.
<b>G17</b>	University HR to demonstrate that complaints/grievance procedures are in place, issued to all staff and operated fairly and independently.
<b>G18</b>	University Registrar's Office to demonstrate that a whistleblowing procedure is in place whereby all staff can confidentially raise issues of concern to a member of the senior team without fear of retribution and there is a process for responding to complaints or reported violations.
<b>G19</b>	Working Group to develop channels for gathering and analysing future risk information from sources such as whistle-blower hotlines, community-facing grievance mechanisms and stakeholder engagement, including suppliers. Establish a process to disclose any issues and build improvement actions based on this data and risk assessment.

## Awareness and training for staff and students

<b>T20</b>	Working Group to engage internally, communicating the university's goals for tackling modern slavery and updates on progress.
<b>T21</b>	Working Group to have a process to make all new staff aware of modern slavery through an organised induction programme and to communicate changes in policies and procedures to staff, students, suppliers and partners.
<b>T22</b>	Campus leaders on education (for example, PVC/APVCs) and Student Union to consider how to integrate the topic of modern slavery into student education and work with faculties/schools to include modern slavery in the syllabi of all front-line degree programmes.
<b>T23</b>	Working Group to outline all relevant parties to inform an on-going awareness and training plan that should include at minimum procurement, senior management, human resources, and compliance officers. Training plan to include how to implement modern slavery policies, identify modern slavery in practice and report on incidents/concerns.
<b>T24</b>	University Procurement to provide regular, specific training for their staff and conduct regular reviews of their procurement practices.
<b>T25</b>	University HR to facilitate training of counselling staff, student tutors, Residential Experience team, campus security staff, 'nightline' volunteers and any other students or staff members who hold pastoral roles within the university to spot the signs that may indicate exploitation and ensure victims who come forward are given appropriate care. This training should be repeated annually.
<b>T26</b>	University HR to ensure staff responsible for recruitment to the university's own operations and labour providers staff are trained on modern slavery policies and risk mitigation strategies. To include instructions to report and record where work-seekers are introduced by an individual claiming be a relative or friend but may be exerting control over the workers (for example, speaking for them or waiting while they are interviewed).
<b>T27</b>	Working Group to support Student Union (SU) council on developing and approving new policies that examine the SU's own supply chains, ethical guidelines for suppliers, staff training and awareness-raising.

## Managing risk in the supply chain

<b>S28</b>	University Procurement to establish an annual risk assessment to analyse where the greatest likelihood of slavery is within the organisation's operations and its supply chain, including subcontractors. Use this, along with spend analysis (indicates where we may have most influence) to prioritise where action is focused and apply due diligence to high-risk suppliers. Disclose priority areas for action.
<b>S29</b>	University Procurement to develop a Supplier Code of Conduct that sets out Slavery and Labour standards to be upheld by direct suppliers and in the supply chain in line with our standards. Use a Supplier Relationship Management Programme to complete an annual check that ensures all managed suppliers' MSA statements are up to date along with reporting of any known breaches either directly or within their supply chain.



<b>S30</b>	University Procurement to ensure the procurement process includes modern slavery in category strategies, with the particular risks of the category identified; tendering process, with specific requirements placed on the supplier when a high risk of modern slavery is present; contracts, with KPIs reflecting specific risks; supplier meetings and contract management.
<b>S31</b>	University Procurement to review and amend procurement practices to ensure they do not exacerbate the risk of modern slavery, develop transparent and open relationships with suppliers and partners and customers, establishing clear, timely communication with suppliers and partners, paying a sustainable price, setting clear lead-times and payment terms and giving preference to suppliers and partners who respect human rights.
<b>S32</b>	University Procurement to ensure that all contracts for recruitment services contain the necessary complaints/grievance procedure, issued to all workers and operated fairly and independently. HR to ensure contractual obligations around MSA are monitored for all recruitment services. Establish systems for monitoring labour providers and labour sourcing agents to ensure no fees are charged to workers, directly or indirectly through the required purchase of goods or services. Discuss and agree the recruitment selection criteria and a fair and non-discriminatory process used by labour providers. Ensure the minimum wage is paid to all staff.
<b>S33</b>	University Procurement and Supplier Relationship Managers to target high-risk areas on which to focus for additional supply chain analysis, for example product areas such as lab consumables or electronics or services such as catering or construction. Explore use of supplier social audits to evaluate risk and support suppliers to mitigate risk over time.
<b>Civic and wider engagement</b>	
<b>C34</b>	Working Group to build networks and engage with organisations operating in the antislavery and labour exploitation arena and with areas such as Supply Chain risk (for example, Electronics Watch) to establish how external tools can be utilised within the university and its supply chain.
<b>C35</b>	Working Group to work alongside university research centres and students to ensure the organisation is participating in and supporting the work of local antislavery multisector partnerships and local prevention programmes. This could include event hosting, support for training materials or website development, and support for front-line professionals in training, and monitoring and evaluation services.
<b>C36</b>	Working Group to help the university develop a partnership approach to modern slavery in the local area with other local universities, to share best practice and work towards goal of creating Slavery-Free Cities.
<b>C37</b>	Working Group to support a university commitment to involving modern slavery survivor input and leadership in Slavery-Free Campus efforts, recognizing the value of the expertise of those with lived experience.
<b>C38</b>	University campus life office to support and encourage student antislavery activities, including by student groups and unions, and where possible, invest in student-led programmes, an example being the campus-wide reading programme University of Nottingham (UoN) Against Slavery (2018-19).







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