

# Modern Slavery Policy Statement

August 2025 to July 2026

## 1. Introduction

This statement sets out Royal Holloway, University of London's policy regarding the requirements of Section 54(1) of the Modern Slavery Act 2015, for the financial year ending 31<sup>st</sup> July 2026.

Royal Holloway's has a long-standing history of championing social inclusion and positive societal change. As a University of Social Purpose, we are committed to empowering our global community through inclusive education, impactful research, and ethical institutional practices.

The University recognises that modern slavery may occur within the global supply chains, including those associated with the University. This statement sets out the areas of potential risk and the actions we are taking to mitigate the risks.

## 2. Identified Risks

The University procures a wide range of goods, services and works, used in its academic and research activities and for its routine business operations. These fall into the following broad categories: Scientific Consumables and Equipment, Travel, Library Resources, Professional Services, ICT Equipment (Electronics and components) and Estate Works and Services.

Within these categories the following types of contracts are likely to carry the highest risks in relation to modern slavery and human trafficking: Agency staff, Construction, Catering Supplies, Cleaning Services, Security Services, Travel, Textiles, ICT(Electronics) Equipment and Services, Scientific Consumables & Office Supplies.

## 3. Our Commitment

The University is committed to carrying out procurement activities in an environmentally, socially, ethically and economically responsible manner and to entering into agreements, and contracts, with suppliers that share and adhere to this vision.

The University has adopted the Sustain Supply Chain Code of Conduct, which has been collaboratively developed and reviewed by the Sustain Project, members including APUC, LUPC, HEPA, EAUC, various HE/FE institutional Procurement and Sustainability leaders, NUS (and other student associations) and People & Planet. It is based on the Ten Principles of the UN Global Compact.

The University expects all its suppliers to comply with its Supply Code of Conduct (<https://rebrand.ly/royalholloway-supplierportal>) which covers the following:

- Social compliance, for example no use of forced or under aged labour, the provision of suitable working conditions and fair treatment of workers.
- Ethical compliance and economic development, for example acting with integrity, compliance with laws and regulations, and support of fair trade.
- Environmental compliance, for example avoidance of environmental harm and taking actions to reduce environmental impact.

The University is a member of the London Universities Purchasing Consortium which considers responsible procurement throughout all of its activities and is considered a leader in this field. The University uses LUPC's Commodity Coding Risk Analysis tool to mitigate supplier risks.

The University is an affiliate member of Electronics Watch (<https://electronicswatch.org/en>), which is an independent monitoring organisation that works with public sector organisations to promote and enable responsible procurement and protect the rights of workers in electronic supply chains.

#### **4. Statement on the University's policy in relation to modern slavery and human trafficking**

Royal Holloway, University of London, commits to acting in an ethical manner and with integrity in its business relationships to implement processes that ensure modern slavery and human trafficking are not taking place in the University's supply chains.

The University does not wish to support or deal with any business knowingly involved in modern slavery, human trafficking, forced and bonded labour and labour rights violations in its supply chains.

The University is committed to tackling modern slavery issues as they may arise in respect of recruitment procedures and will act in compliance with legal requirements under the Act. The University only wishes to work with employment agencies which likewise comply with the Act. We will apply selection and recruitment practices that help identify and tackle modern slavery.

The University encourages all colleagues, students and visitors to report any concerns to [procurement@rhul.ac.uk](mailto:procurement@rhul.ac.uk) relating to its direct activities and in respect of its supply chains where they believe there is or maybe a risk of non-compliance with this policy.

#### **5. Actions taken during 2024-25**

- Our RH2030s strategy was developed during the previous year and marks a milestone in Royal Holloway's journey as a University of Social Purpose. The theme of social purpose is at the heart of RH2030s and runs through all of the University's Strategic Ambitions.
- The University achieved accreditation by the Living Wage Foundation in December 2024, to ensure our commitment to our employees and for those providing a service via a third-party supplier on University premises.
- We continue to ensure that Modern Slavery is included in every higher-cost procurement exercise as standard. The University aims for a scoring of 10% to relate to social value. For example, during 2024-25 it was considered as part of the procurement for the following goods and services:
  - (Provision of General FM Services) – Further Competition under Higher Education Framework Agreement
  - Provision of Hot Beverage Ingredients, equipment and associated coffee shop products – Further Competition under TUCO Higher Education Framework Agreement
  - Supply and Delivery of Workstation PCs & Associated Warranty for the Advanced Geocomputing Lab – Further Competition under Higher Education NDNA framework Agreement
- The University continues to utilise framework agreements where Modern Slavery and Social Value considerations are paramount especially concerning categories of goods or services that pose a higher risk such as the Catering and Food industries for example

TUCO ensure that every aspect of the behaviours and principles specified by the Modern Slavery Act 2015 is supported and maintained by TUCO Suppliers.

- The Procurement team has successfully completed the official training modules for the Procurement Act 2023. The Procurement Act places a stronger emphasis on social value as a core criterion in procurement activities and the modules serve as the primary learning resource to support practitioners in implementing the new legislation
- The Procurement team have completed Modern Slavery training relating to protecting human rights in the supply chain modules provided by BUFDG in conjunction Professional HE Services (PHES) and Higher Education Procurement Association (HEPA)
- The University will not accept philanthropic donations from individuals or organisations where the University is of the reasonable belief that the individuals or organisations are responsible for serious breaches of internationally recognised human rights and / or discrimination against an individual or group. (Include diligence checks that are undertaken)

#### **6. Ensuring adherence to this policy**

Royal Holloway will make available this policy to all students, colleagues, suppliers and the public, together with plans and procedures that will impact the supply chain management in respect of modern slavery, human trafficking, forced and bonded labour and labour rights violations. The University will assess instances of non-compliance and take remedial action as appropriate.

#### **7. Plans for 2025-26**

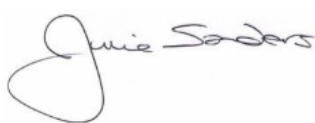
As part of our ongoing commitment to addressing modern slavery and safeguarding human rights across our operations and supply chain, the University will continue to implement and refine its action plan, which will be subject to annual review. Entering the new financial year, the University will evaluate its performance against the following strategic initiatives.

- From January 2026, all new suppliers will be expected to sign the University's Supply Chain Code of Conduct before being approved to be added as a supplier on our finance system. The Code sets out social, environmental, and ethical standards that suppliers are expected to comply with.
- Procurement will conduct risk profile of supplier base, particularly in categories with high modern day slavery risks, including: IT Equipment, Audio Visual, Catering, Cleaning, Construction, Recruitment agencies, Security, Travel, and Waste management.
- Proactively monitor the supply chains identified as potential risks, to inform decisions and take appropriate action as required.
- Continue to keep an up-to-date suite of University standard contract templates to include appropriate modern slavery terms and conditions.
- Develop a mechanism to ensure consistent tracking of training compliance across the organisation for colleagues who are involved in the procurement of goods and services.
- Continue to work with Electronics Watch to coordinate supplier compliance and due diligence in relation to this legislation.
- Continue to explore new opportunities for action with the Head of Sustainability.
- Follow the latest advice and recommendations published by the Chartered Institute of Procurement and Supply (CIPS) regarding Modern Slavery and Human Trafficking in the supply chain.
- Investigate the implementation of Digital tools and services to assess and monitor supplier compliance within our supplier base.
- Collaborate closely with Higher Education Consortiums and Framework operators to implement effective tools and procedures for monitoring and meaningful supply chain engagement. For example,

- The London Universities Purchasing Consortium (LUPC) has recently launched their Responsible Procurement (RP) Hub, designed to support LUPC-managed framework suppliers in completing a supplier due diligence questionnaire. The Hub is currently in its initial phase, with suppliers actively submitting responses LUPC is planning to make the Responsible Procurement (RP) Hub available to members in early 2026, following a thorough evaluation of supplier submissions. The Hub will offer members access to robust benchmarking data, designed to enhance and support responsible procurement practices.
- The Southern Universities Purchasing Consortium (SUPC) is exploring the development of a Responsible Procurement Framework Agreement. The framework will be designed to help higher education institutions, and the wider public sector achieve responsible procurement outcomes across a number of key areas. This framework will include the provision of Digital tools and services to assess, manage, and monitor modern day slavery risks and human rights due diligence in supply chains. The framework agreement is expected to be in place in October 2026.

This statement will be reviewed and updated on an annual basis.

Approved by Council 27 November 2025



Signed:

**Professor Julie Sanders**  
**Vice-Chancellor & Principal**