

Modern Slavery and Human Trafficking Statement

2024-25

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Committee Approval

Committee	Committee Action	Date
SMT	Recommended for approval	6 March 2024
Board of Directors	Approved	18 March 2024
	Date in force	19 March 2024

This Modern Slavery and Human Trafficking Statement will be reviewed annually by our Senior Management Team (SMT) for recommended approval by our Board of Directors. Any amendments require the approval of the Board of Directors

1. Introduction

At Bloomsbury Institute, we are committed to promoting and advancing equality, diversity, inclusion and an equal society as key features within all our activities and relationships, as we believe this to be ethically right and socially responsible. The equitable treatment of all is one of our core values, underpinning our success as a community of scholars. It is also reflected within our [Ethics Policy](#)¹ in which we set out the seven ethical principles with which we expect all members of our academic community to act. These include concern for others, integrity, dignity and respect, and sustainability.

For these reasons, we are committed to protecting and respecting human rights and acting with integrity in all our activities, relationships, and supply chains. We are also committed to protecting our student body from possible exploitation by third parties (e.g. through exploitative unpaid internship opportunities) and aim to identify and support students through our [Safeguarding Policy](#)². Consequently, ours is a zero-tolerance approach to slavery and human trafficking and we expect the same of our suppliers, contractors, and all those with whom we do business regardless of whether they are based in the UK or abroad.

Slavery is an overarching term used to cover a number of practices. The most common forms of modern slavery include:

- **Human trafficking:** The use of violence, threats or coercion to transport, recruit or harbour people in order to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal.
- **Forced labour:** Any work or services people are forced to do against their will under threat of punishment.
- **Debt bondage/bonded labour:** The world's most widespread form of slavery. People trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt.
- **Slavery of children:** When a child is exploited for someone else's gain. This can include child trafficking, child soldiers, child marriage and child domestic slavery.

The [Global Slavery Index](#)³ (published by the Walk Free human rights organisation) estimates there are more than 40 million victims of modern slavery around the world today, many working in the supply chains of western corporations. According to government statistics, in 2021 12,727 potential victims of human trafficking and modern slavery (up 20 per cent on the previous year) were identified in the UK whilst in the year to March 2019 the police in England and Wales recorded 5,144 modern slavery crimes (an increase of 51% from the previous year). However, many more crimes and victims go undetected.

This statement has been published in accordance with section 54 of the [Modern Slavery Act 2015](#)⁴. It sets out our current practices and future plans to prevent modern slavery and human trafficking within our business activities and supply chain.

By complying with the Modern Slavery Act 2015, we seek to support the UK Government's approach to implementing the [UN Guiding Principles on Business and Human Rights](#)⁵, and the United Nations Sustainable Development Goal 8.7. The latter commits organisations to:

“Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms”.

¹ <https://www.bil.ac.uk/qem/policies/>

² <https://www.bil.ac.uk/qem/policies/>

³ <https://www.globalslaveryindex.org>

⁴ www.legislation.gov.uk/ukpga/2015/30/contents/enacted

⁵ https://www.ohchr.org/documents/publications/guidingprinciplesbusinessshr_en.pdf

2. Our Organisation

Bloomsbury Institute is a private company limited by shares, that was incorporated on 14 August 2002 as the London School of Business and Management.

We are a small private higher education provider, regulated by the Office for Students and pride ourselves in providing disadvantaged and underrepresented students with access to a transformative higher education experience.

We deliver undergraduate and postgraduate degrees in accounting, business and law that are validated by the University of Northampton and Wrexham University. As well as working with the University of Northampton, and Wrexham University, we also have an agreement with Birkbeck College, University of London for the provision of teaching space. These partnerships enable us to provide our students with a high-quality 'university experience' with significant, individual support in the heart of London. These partners also share our commitment to preventing modern slavery and human trafficking, as evidenced by their own statements on the subject.

3. Awareness

We recognise that increased awareness and reporting helps to tackle the perpetrators of modern slavery as well as protect victims.

We are committed to ensuring that our staff are aware of the risk of modern slavery and human trafficking. Consequently, all Heads of Divisions/Departments and all staff within both our Estates and Facilities Department, and our Finance Department are required to read the UK government's [Modern Slavery Awareness & Victim Identification Guidance](#)⁶ and also its [Transparency in supply chains: a practical guide](#)⁷.

We will continue to draw on advice and guidance from external bodies such as the Office for Students, the Home Office and recognised anti-slavery charities⁸ to support an ongoing best practice approach to supply chain management and the elimination of modern slavery.

We are also aware of media reports of suspected victims of human trafficking being brought to the UK on student visas at other universities. We continue to monitor the attendance of students and will continue to raise staff awareness of the importance of doing so for the reasons of preventing modern slavery and human trafficking.

Eliminating modern slavery effectively requires improved traceability, increased transparency and collaboration between statutory agencies, civil society organisations and both public and private sector business.

Responsibility for supply chain management transparency and anti-slavery initiatives rests with our PTC department, Chief Operating Officer & Chief Financial Officer, and Deputy Chief Executive Officer.

4. Risk

We recognise the potential risks inherent in any supply chain given the scope for use of unknown or hidden subcontractors where lower-wage staff may be employed. Although, we consider these to be low given the nature of our activities and related supply chains, and the fact that the vast majority of our suppliers are based in the UK where modern slavery and human trafficking are less prevalent than in some countries, we take our responsibilities as an ethical organisation extremely seriously. We are

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/655504/6.39_20_HO_Modern_Slavery_Awareness_Booklet_web.pdf

⁷ <https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide/transparency-in-supply-chains-a-practical-guide>

⁸ Examples of UK charities include www.unseenuk.org and www.antislavery.org

therefore committed to mitigating against any related risk occurring in this area through our policies and procedures, and also by encouraging the reporting of suspected concerns through awareness raising initiatives.

We proactively analyse address details of all students after each intake to determine if there is multiple occupancy at one address which raises possible risks to students.

5. Our supply chains

Although Bloomsbury Institute is committed to offering Value for Money ('VfM') and maintaining the highest standards of efficiency and integrity in the procurement of goods and services, it also takes into account other important considerations that underpin the VfM principle. These include the recognition of whole life costing, quality, environmental issues, running costs and whether the product is recyclable.

Our supply chains include various providers who supply products and services in the areas of recruitment, property, IT, facilities management and general goods and services. All products and services are sourced directly by us.

Where possible we build long-standing relationships with suppliers and make clear our expectations of business behaviour.

We have separate procurement procedures which outline and guide staff in the Institute on ethical procurement practices.

In April 2016, we became accredited as a Living Wage employer by the Living Wage Foundation. The Living Wage commitment ensures that everyone working at Bloomsbury Institute (regardless of whether they are permanent employees or third-party contractors) receives a minimum hourly wage (currently £11.95). This is significantly higher than the national minimum wage for over 25s of £8.91 per hour.

The above is further enforced by the raft of policies we have in relation to workplace rights. These include an Equality, Diversity and Inclusion Policy, a Dignity and Respect Policy, Staff Grievance Procedure and our Ethics Policy (which captures Whistleblowing) to mitigate against improper conduct or unethical behaviour.