Queen Mary
University of London

Compliance with the Modern Slavery Act 2015
Modern Slavery Statement 2025/26

1. Introduction

Modern slavery, encompassing slavery, servitude, forced or compulsory labour and human trafficking, is a serious violation of human rights. It involves the exploitation of individuals for personal or commercial gain and the deprivation of their freedom and dignity. Queen Mary University of London (Queen Mary) is committed to preventing, identifying and addressing the risk of modern slavery and human trafficking across its operations and supply chains, and to promoting respect for human rights throughout its community and wider business relationships.

This statement, made in accordance with section 54(1) of the Modern Slavery Act 2015, outlines Queen Mary's actions to address slavery and human trafficking for the financial year ending 31 July 2026.

Queen Mary did not receive any reports of instances of modern slavery or human trafficking during the financial year ending 31 July 2026.

2. Organisation Overview

Queen Mary is a leading research-intensive institution in the UK, with over 32,000 students from more than 170 nationalities. Established in 1785, we have a long-standing commitment to research and educational excellence, diversity, inclusion and community engagement.

In the academic year 2025–2026, Queen Mary employed over 5,300 staff and reported a consolidated turnover of £760.4 million.

3. Organisational Structure

Queen Mary's strategic direction is overseen by Queen Mary Council, with support from various operational committees.

4. Supply Chain Overview

Queen Mary's procurement and supply chains are managed across several key categories, including estates, professional services, IT, and scientific and laboratory supplies.

Category	Includes
Estates	Projects and maintenance
Professional Services & Facilities Management	Human Resources, Finance, Marketing and Facilities
IT	Projects and service delivery
Scientific & Laboratory	Scientific and laboratory equipment and consumables

Queen Mary recognises that modern slavery risks can vary according to factors including the nature of the goods or services procured, geographical location, labour intensity, use of subcontractors and the vulnerability of workers. Particular consideration is therefore given to higher-risk areas of the supply chain, including labour-intensive services, construction, cleaning, catering, facilities management and certain globally sourced goods.

In 2025–2026, 38% of spend was undertaken with small and medium-sized enterprises (SMEs). Engagement with SMEs forms part of Queen Mary's wider responsible procurement approach, supporting local economic development, employment opportunities, social value and fair working conditions while enabling the University to engage with diverse and local supply markets and maintain appropriate expectations around ethical business practices, labour standards and modern slavery.

5. Policies, Governance and Commitments

Queen Mary is committed to preventing and addressing modern slavery and human trafficking within its operations and supply chains. The University has implemented the following measures to support this commitment:

- **Employee Terms:** All directly employed staff are on standardised terms, with a commitment to pay the London Living Wage as a minimum.
- **Agency Workers:** Agencies supplying staff to Queen Mary must pay the London Living Wage and verify the identity and right to work of their staff.
- **Procurement and Contracts:** All major service and goods contracts are reviewed by Queen Mary's Procurement Team. Social value, including consideration of modern slavery risks, is embedded within the evaluation of relevant tenders and contract requirements.

- **Responsible Procurement:** Queen Mary promotes the use of national and consortia frameworks where appropriate assurances are in place and relevant modern slavery, and responsible procurement checks have been completed.
- **International Partnerships:** Due diligence processes and legal agreements for academic partnerships include a commitment to comply with the Modern Slavery Act.
- **Workplace Culture:** Queen Mary maintains a commitment to dignity, respect and not tolerating bullying or harassment. The Report & Support Platform allows staff, students and visitors to report concerns and incidents.
- **Governance for Inclusion:** Queen Mary has established a governance group to lead, govern and progress its Culture and Inclusion priorities, including Disability Inclusion. This work supports the University's wider commitment to dignity, respect and an inclusive working and learning environment, alongside its mechanisms for raising and addressing concerns.
- **Whistleblowing:** Queen Mary's whistleblowing arrangements provide a mechanism for individuals to raise concerns about unethical conduct and other matters of concern.
- **Equality, Diversity and Inclusion:** Queen Mary has an EDI group and mandatory EDI training for all staff. Additional modules on unconscious bias and tackling barriers are provided.
- **Electronics Watch:** Queen Mary is affiliated with Electronics Watch to improve labour rights and working conditions in global electronics supply chains.
- **Sustainability:** The Procurement and Sustainability teams work together to support responsible and sustainable procurement, including consideration of environmental and social value impacts.
- **Fairtrade and Ethical Sourcing:** Queen Mary prioritises Fairtrade-certified and ethically sourced products, particularly for food and drink sourced from less economically developed countries. Catering outlets will continue to use Fairtrade and ethically sourced products where appropriate.
- **Professional Standards:** Procurement staff adhere to the Chartered Institute of Procurement and Supply (CIPS) Code of Conduct and complete ongoing training in ethical procurement, promoting integrity, transparency and accountability in procurement activities.
- **Recognition for Excellence:** Queen Mary's Procurement Team received multiple accolades in the 2025 and 2026 GO Awards, recognising its work in ethical, sustainable and socially responsible procurement. This external recognition

reflects the University's wider commitment to embedding responsible procurement principles across its purchasing activities.

6. Risk Assessment and Procurement Due Diligence

Queen Mary uses a risk-based approach to identifying, assessing and managing modern slavery risks within its supply chains. As part of its procurement processes, Queen Mary implements a range of measures to identify, mitigate and address modern slavery risks, including:

- **Supplier Declarations:** Suppliers tendering for Queen Mary opportunities must declare their compliance with the Modern Slavery Act and, where required, provide a copy of their modern slavery policy or statement.
- **Modern Slavery Clauses:** Standard contract terms include Modern Slavery clauses to ensure supplier accountability.
- **Construction Suppliers:** Where appropriate, pre-qualification tools and supplier databases, such as Constructionline, is used to support the due diligence and assessment of construction contractors.
- **Site Visits:** Queen Mary reserves the right to conduct risk-based site visits or interviews with workers where there are concerns regarding compliance.
- **Frameworks and Consortia:** Queen Mary promotes the use of national and consortia frameworks where appropriate assurances are in place and relevant modern slavery checks have been completed.
- **Social Value Metrics:** Social value is incorporated as an evaluation criterion in relevant tender exercises. During 2025/26, Queen Mary procurement exercises delivered over £2.25 million in social value outcomes. This forms part of the University's wider responsible procurement approach.

7. Training and Awareness

Queen Mary recognises the importance of ensuring that relevant staff understand modern slavery risks, their responsibilities and the appropriate routes for raising concerns.

- **Training and Guidance:** Dedicated web resources and training sessions have been developed to inform staff about the Modern Slavery Act and their responsibilities. This includes guidance on modern slavery, protecting human rights in supply chains, HE procurement and sustainable procurement.

- **Procurement Training:** Buyer training incorporates procurement due diligence on responsible procurement, including the prevention of modern slavery and human trafficking.

8. Collaboration and Knowledge Sharing

Queen Mary recognises the importance of collaboration across the higher education and wider public sector procurement community in addressing modern slavery and strengthening responsible procurement.

During 2025/26, Queen Mary led / contributed to events focused on responsible procurement, modern slavery and social value, including:

- **LUPC/SUPC Conference – Delivering Social Value through Procurement:** Queen Mary led and delivered at regional conference to share good practice and encourage attendees to drive social value.
- **LUPC Responsible Procurement Exchange:** Queen Mary hosted the LUPC Responsible Procurement Exchange, which included discussion of modern slavery risks, common misconceptions and good practice in identifying and managing modern slavery within supply chains. The event provided an opportunity to share experience and strengthen procurement approaches across the higher education sector.
- **Growth, Skills and Innovation: Building Prosperity in East London:** Queen Mary hosted a roundtable exploring how large institutions in East London, including the NHS, local authorities, CWG and universities, can collaborate to support the local economy through inclusive and socially responsible procurement. The discussion considered procurement, social value, employment equality and opportunities to promote fair and responsible employment practices.

These activities support Queen Mary's commitment to sharing good practice and developing procurement capability across the higher education and wider public sector. They also provide opportunities to strengthen collective understanding of modern slavery, responsible procurement and social value.

9. Response to Modern Slavery Concerns

Queen Mary is not aware of any reported modern slavery or human trafficking violations during the financial year ending 31 July 2026. The absence of reported incidents does not remove the need for continued vigilance, effective due diligence and appropriate reporting and response arrangements.

If modern slavery or human trafficking is identified or suspected, Queen Mary will take appropriate and proportionate action. This may include investigating the concern, carrying out further supplier checks, engaging with the supplier and relevant stakeholders, agreeing corrective action and escalating the matter where appropriate.

Queen Mary will seek to ensure that its response is focused on preventing further harm and, where appropriate, supporting the protection and remediation of affected individuals. Concerns may be referred to relevant internal functions or external authorities where appropriate.

Queen Mary will use any identified issues, incidents or lessons learned to review and improve its policies, procedures, training, due diligence and procurement controls.

10. Future Commitments

Queen Mary will continue to strengthen its approach to modern slavery and responsible procurement through the following commitments:

- **Supplier Engagement:** We will continue to strengthen engagement with suppliers to improve understanding of modern slavery risks and responsible procurement expectations, while encouraging and supporting suppliers to maintain appropriate standards across their supply chains.
- **Supplier Guidance and Compliance:** Queen Mary will provide registered suppliers with supplier information pack containing vital information on doing business with Queen Mary, including our expectations regarding responsible procurement and compliance with modern slavery legislation. We will continue to reinforce the importance of suppliers complying with applicable modern slavery legislation and maintaining appropriate standards throughout their supply chains.
- **Continuous Communication:** We will continue to communicate with departments across Queen Mary to increase awareness of modern slavery risks, responsibilities and reporting routes, and to reinforce the importance of identifying and reporting concerns.
- **Social Value:** Queen Mary will continue to strengthen and expand social value initiatives through its tendering processes and engagement with existing suppliers. The University aims to deliver progressive social value outcomes supporting its wider responsible procurement objectives.
- **Collaboration:** We will continue to engage with higher education procurement networks and the London Universities Purchasing Consortium to share

experience and learn from best practice in responsible procurement and modern slavery risk management.

- **National and Consortia Frameworks:** We will continue to promote the use of national and consortia frameworks where appropriate assurances are in place and relevant modern slavery checks have been completed.
- **Fairtrade and Ethical Sourcing:** Catering outlets will continue to use Fairtrade and ethically sourced products where appropriate.
- **Ongoing Education:** We will continue to provide relevant web resources and training, including resources available through BUFDG, to ensure that relevant staff understand their responsibilities relating to modern slavery. Buyer training will continue to incorporate procurement due diligence and the prevention of modern slavery.
- **Response to Identified Risks:** Where modern slavery or human trafficking is identified or suspected, Queen Mary will take appropriate action, including investigation, supplier checks, corrective action and escalation.
- **Continuous Improvement:** We will continue to review our policies, procedures, training, due diligence and contractual arrangements to ensure that modern slavery risks are appropriately identified, managed and mitigated.

11. Statement of Compliance and Approval

Queen Mary is committed to meeting its obligations under the Modern Slavery Act 2015 and to continuously improve its approach to identifying and managing the risks of modern slavery and human trafficking.

Queen Mary is confident that, to the best of our knowledge, we are fully compliant with our obligations under the *Modern Slavery Act 2015*. We will continue to review and enhance our policies, procedures, and contractual arrangements to ensure that best practices are embedded across our operations and supply chains.

Name: **Professor Colin Bailey**

Position: **President and Principal**

Date: 9/11/2026

Signed:

