

Modern Slavery Statement

Version 2025/2026 Public

Modern slavery is the exploitation of people who have been forced, deceived, or coerced into a life of labour and servitude for personal or commercial gain. It is a violation of fundamental human rights. The following statement has been made pursuant to section 54(1) of the Modern Slavery Act (2015) and sets out Fairfield School of Business' commitment to combatting the practices of modern slavery and human trafficking.

Fairfield School of Business Ltd.

Fairfield School of Business (FSB) is higher education and training provider dedicated to excellence in teaching, research, and community engagement. Our operations include academic teaching, research activities, administrative activities, facilities management, and procurement of goods and services.

In any form it may take, slavery is repugnant to the FSB's mission, which is to empower people to improve their lives by developing their personal, professional and economic potential.

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

Policy and Procedure

We are committed 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 are not taking place anywhere in our supply chains. Our relevant policies include:

 Procurement Policy: This policy outlines our commitment to responsible sourcing and requires suppliers to adhere to ethical standards, including compliance with the Modern Slavery Act 2015.

- **Dignity Policy:** This policy promotes the equitable and ethical treatment of people with whom FSB has contact and defines the kinds of behaviour which are unacceptable.
- **Our Whistleblowing Policy:** This policy encourages staff and students to report any concerns about unethical practices, including modern slavery, without fear of reprisal.
- Staff Code of Conduct: This sets out the expected standards of behaviour for all staff, emphasising integrity and respect for human rights.

Risk Assessment and Management

We have determined the following areas to be of particularly high risk in terms of unwittingly supporting or enabling modern slavery or human trafficking.

1. Procurement and supply chains

FSB ensures that its acquisition of goods and services does not cause harm to others. A dedicated Procurement Policy is in place which determines how purchases made This commits FSB (Fairfield School of Business) to acting transparently and ethically in its selection of vendors, products and services by specifying appropriate background checks and due diligence procedures.

We have identified the following key areas of risk in our supply chains where we must be exceptionally diligent:

- **Construction and facilities management:** The construction sector is known to be vulnerable to modern slavery, particularly in relation to labour supply chains.
- Catering and hospitality: The food and hospitality sector can present risks related to labour exploitation.
- **Procurement of IT and electronic equipment:** Global supply chains for electronic goods can be complex and may involve risks of forced labour.
- Cleaning and security services: These services can involve low wage workers and therefore present a higher risk.
- Purchasing branded merchandises (such as textiles, stationary, utensils, etc): These
 products often involve multiple tiers of suppliers, spanning different countries with
 varying labour laws and enforcement. Textiles are known for complex supply chains,
 from raw material sourcing (cotton farming, for example) to manufacturing and
 finishing.

To mitigate these risks, we:

- Conduct ongoing monitoring of our supply chains and regularly review our risk assessments.
- Provide training to relevant staff on modern slavery issues and how to identify and report potential risks.
- Work collaboratively with our suppliers to improve transparency and ethical standards.
- We monitor and follow sector specific guidance, and best practice, as it becomes available.

2. Tendering and contract performance management

FSB ensures that the tendering process for new suppliers and contractors and the management of the performance of, and relationship with, suppliers and contractors include the provision and subsequent monitoring of compliance with our policies.

3. Organised gang activity

FSB's students are eligible for financial support from Student Finance England. This can make institutions like FSB a target for organised criminal gangs seeking to exploit the student finance system to access maintenance grants by fraudulently presenting themselves as genuine students. We recognise that people involved in these activities may be vulnerable to coercion or exploitation by these gangs and may be acting under duress.

We mitigate this risk by having robust student application vetting and identity verification procedures in place, and by working with our strategic partners to ensure that all students admitted to FSB are genuinely committed to academic study. This is reinforced by mechanisms for detecting the kinds of academic misconduct commonly associated with these frauds (such as third-party assignment writing and proxy test takers).

Central and regional management at FSB liaises with local government agencies and safeguarding teams to understand the regional threat picture in relation to local organised criminal activity.

4. Working with strategic partners

FSB works with external awarding body partners who validate its higher education awards. Such partnerships are established exclusively with reputable mainstream UK higher education providers who are subject to regulatory oversight, and who have in place their own Modern Slavery and anti-trafficking policies and procedures.

5. Student Representatives

FSB engages students in the quality assurance of its learning opportunities. Collective student engagement is achieved by means of elected representatives who undertake certain duties in liaising with FSB's academic management. For legal reasons, student representative roles must be unpaid, and this is made clear during students' inductions.

These arrangements are entered into voluntarily and may be discontinued by either party without notice at any time. This is made clear to Student Representatives at an induction.

FSB's Academic Board Maintains oversight of these arrangements, ensuring that expectations of Student representatives' work are reasonable, and that Student Representatives enjoy all rights and privileges enshrined Student Union's Constitution and the Student Charter.

Raising awareness

Raising staff awareness of the problem of modern slavery is a strategic priority for FSB and over the coming academic year we intend to:

- Develop and deliver training modules on modern slavery for staff involved in areas of risk identified herein. This will include guidance for staff on how to spot signs of abuse, which may be indicative of coercion or enslavement.
- Incorporate information on modern slavery into our induction programs for new staff.
- Provide educational materials and resources to students to raise awareness of the issue.

Communication of this statement and our stance on modern slavery will be made to all staff members during our tri-annual staff training events; key policy owners will be requested to ensure their respective policies and procedures uphold the commitments outlined herein.

Reporting Breaches

FSB's Protected Disclosure (Whistleblowing) Policy and Procedures provides an unambiguous recourse for individuals to report instances around serious malpractice or impropriety, which may be in breach of the law, whether occurring within the organisation, its supply chains, or its strategic or commercial partners.

The Whistleblowing Policy is posted prominently on FSB's website here: https://fsb.ac.uk/school-policies/ and signposted in other related guidance documents.

Mohammed Zaidi

Chief Executive Officer of Fairfield School of Business

Document governance

Document owner* Chief Executive Officer

Consulted parties** Executive Committee

Next update due March 2026

Classification **Public** – Anyone can view this document.

Versions

Version no.	Description of Changes	Approved by	Date
0.1 Draft	Original draft presented to the governors of FSB.	-	-
1.0	Voluntarily adopted	Board of Governors	Oct 2022
1.1	Annual review	Board of Governors	Oct 2023
2.0	Substantially updated to cover related policies and procedures.	Board of Governors	Mar 2025



^{*}Responsible for updates to this content.

^{**} To be consulted on updates to this content.