



University of London Anti-Slavery and Human Trafficking Statement 2019-2020

This statement has been published in accordance with section 54 of the Modern Slavery Act 2015. It sets out the steps taken by the University of London for the year ending 31 July 2020, to ensure transparency in our supply chain and prevent modern slavery and human trafficking, within the business activities or supply chain, of the University of London and its subsidiaries.

Introduction

Modern slavery encompasses slavery, servitude, forced and compulsory labour and human trafficking. The scale of modern slavery globally remains significant. The UN's [International Labour Organisation](#) estimates that [40.3 million people around the world are trapped in some form of modern slavery](#). In the UK, estimations vary from 13,000 victims as estimated by the Home Office to 136,000 victims as recently [published by the Walk Free Foundation](#); modern slavery crimes are being reported across the country and year on year increases in the number of victims identified continues.

As a University, we are concerned that Modern Slavery is considered to be a growing issue globally. This concern reinforces our commitment to treat people in our business and supply chain in a fair and transparent way, including working with our suppliers to actively collaborate and promote and support the objective of eradicating modern slavery.

1.0 The University of London Structure, Organisation and Supply Chain

The University of London is a federation of 17 independent member institutions of outstanding reputation, and a number of highly acclaimed central academic bodies and activities. Since our foundation in 1836, we have built a distinctive approach to learning, teaching and research, have provided high-quality and innovative services and have maintained an extensive portfolio of property located primarily in Bloomsbury, the heart of London's Education Quarter. We collaborate to deliver world-leading services including the Senate House Library, the Careers Group and CoSector; and, through our University of London distance learning programmes, we reach out to thousands of students across 190 countries globally.

This statement covers the activities of the University of London itself and its trading subsidiaries. The academic portfolio covers the University of London distance learning programmes; the School of Advanced Study (SAS) and its constituent Institutes; Senate House Library (SHL); the University of London Institute in Paris (ULIP); and the Careers Group. Beyond that, the University also provides a suite of innovative, high-quality academic support and professional services, and manages a valuable property portfolio providing teaching and learning space, student halls of residence and conference facilities.

The active trading subsidiaries, all wholly owned by the University are;

- CoSector Limited
- Senate House Services One Limited
- Senate House Worldwide Limited.

2.0 Understanding Our Supply Chains

The Procurement Team manage a diverse portfolio of procurement activities, from strategic procurement development to managing the tender process and contract management. We purchase a large range of services, products and works that support the University's objectives; these are procured within three broad procurement categories:

1. Property & Facilities Management
2. Corporate & Academic Services
3. IT and Digital Services (ITDS)

Whilst most contracts consist of a one tier structure of client to supplier, some contracts have deeper and broader supply chains, such as products, works or more complex services.

The majority of our suppliers are based in the UK, however, we also purchase products and services from international sources. We have identified high risk areas of spend within these broad categories and have put in place due diligence and mitigations where possible.

3.0 Developing Policy & Due Diligence

We conduct due diligence on our supply chain based on our assessment of the potential risk and the potential value of the contract under consideration. This can include a combination of the following:

- Highlighting potential risks relating to Modern Slavery with suppliers; particularly those with annual turnovers below the Modern Slavery Act 2015 reporting requirements. We have worked with suppliers to identify risks and ensure appropriate safeguards and process improvements are put in place.
- During the tendering process suppliers are required to complete a prequalification questionnaire where they state they have not been convicted of an offence under section 2 or section 4 of the Modern Slavery Act 2015.
- In contracts where the relevant market or geographic region has been identified as a higher risk regarding modern slavery issues, project teams will develop specifications that challenge the supplier on their supply chain management policies and practices.
- Where appropriate the University will either conduct on-site inspections to audit the supplier or through our affiliated membership of Electronics Watch.
- The Procurement Team has developed a formal contract management system that evaluates contract performance at implementation, on an ongoing basis and at an annual, strategic level. Each performance review is based upon agreed performance indicators, including evaluation on contract sustainability and supply chain

"The University of London Procurement Team is committed to upholding the Modern Slavery Act 2015 within our procurement, contract management and supply chain management operations. We will develop and deliver responsible purchasing policies, carry out due diligence and risk assessments in purchasing and contract management and create awareness of modern slavery amongst the procurement and contract management community at the University."

*The University of London Procurement Policy
September 2016*

electronics  watch

Electronics watch is an independent monitoring organization working to achieve respect for labour rights in the global electronics industry through socially responsible purchasing and holds companies to account where instances of modern slavery are found.

management. At all stages of the procurement and contract management process, we use our best endeavours to challenge suppliers that do not meet our standards regarding modern slavery. In the supplier selection phase we may remove from competition suppliers that do not agree with the University's policies or who have poor supply chain practices in place. In contract management, contracted suppliers will be required to take the necessary action to improve their service delivery and we will work with them to address any supply chain concerns. If the supplier does not improve the University may terminate the business relationship.

4.0 Risk Assessment & Management

A key discipline in procurement is the identification and management of risk. Procurement staff members manage risk at all stages of the procurement and contract management process by taking appropriate action to mitigate or remove risk to the University. As procurement professionals, we observe the guidance on modern slavery that has been established by the Chartered Institute of Procurement & Supply. We also go beyond the auditing and compliance approach by improving our understanding of where the risks are greatest and prioritising our activity accordingly.

- We engage with our buyers and contract managers at the University, our suppliers and University senior management and decision makers to learn where supply chain risks may lie.
- All procurement projects include a risk management process that identifies, assigns ownership and endeavours to manage the areas of procurement and supply chains where there is a risk of modern slavery taking place. This information may lead to detailed supply chain specifications for tenderers or where the risk is too great, it may lead to the project ceasing to develop further.
- We have started using category management principles to identify spend at the University and to plot how we spend in more vulnerable markets.
- Procurement and contract management staff have a responsibility to be alert to the risks in the University's contracts and in our wider supply chains. Buyers and contract managers are expected to report concerns to the Finance Director and to their line manager or budget holder. In emergency situations the relevant authorities must be contacted in the first instance. Management will work together to act upon these risks.

5.0 Raising Awareness & Collaboration

As the strategic knowledge base for procurement at the University of London, the Team is committed to staying aware of modern slavery developments, legislation and case studies involved in procurement and contract management. Eliminating modern slavery effectively requires improved traceability, increased transparency and collaboration between statutory agencies, civil society organisations and both public and private sector business. Working together we can make an even bigger difference in upholding human rights:

- The University's Chief Financial Officer is responsible for supply chain management transparency and anti-slavery initiatives.
- The Procurement Team raises awareness amongst the procurement and contract management community and collaborate to share best practice. We do this through providing information on the intranet, a monthly departmental newsletter, a programme of bite-sized procurement learning events and more comprehensive procurement and contract management training courses.
- We will work in collaboration with other universities and external bodies such as LUPC, Office for Students, the Home Office and recognised anti-slavery charities to share and develop best practice in supply chain management and the elimination of modern slavery.
- We raise awareness through the development of a procurement training course on Responsible Procurement or promoting other useful resources, including details of the Modern Slavery Act, supply chain management and improving transparency.

- The Procurement Team will undertake a survey of the University’s supply chain to find out their awareness and planning regarding modern slavery.

6.0 Other activities

Global engagement is a key activity for the University. The University of London’s distance and flexible learning operations connects with around 48,000 students in over 190 countries through its study programmes. All our Recognised Teaching Centres are verified through a quality assurance review on a regular basis, our contracts of engagement also include appropriate clauses under the Modern Slavery Act.

7.0 Strategic Planning

Buyers and contract managers both have a part in increasing transparency to eliminate modern slavery in procurement and supply chains. Plans to eliminate slavery and human trafficking will be developed on an ongoing basis in order to stay aware of market, product and service vulnerabilities.

- The Procurement Team have developed a 3 Year Procurement Plan to review and plan future procurement activity and identify resource needs. The Plan will be used to identify both sustainable procurement opportunities and supply chain vulnerabilities such as modern slavery.
- Procurement will work to create links between the Modern Slavery Statement, the Responsible Toolkit and the University’s other key strategies and policies, wherever relevant.
- Procurement will further develop guidance and training on contract management with an emphasis on supply chain management and Responsible Procurement.
- In future the Procurement Team will review the University’s existing supply chains, in light of the supplier survey (above) and update procurement KPIs and risk registers to include references to modern slavery.

8.0 Our Achievements in 2019-2020

Throughout the year the University awarded several contracts for products, services and works. Observing the principles in 3.0 above each tender confirmed: all bidding suppliers agreed to observe the Modern Slavery Act 2015 at the prequalification stage; each specification included modern slavery questions, where relevant and evaluation criteria was developed for sustainability issues, including modern slavery. Where contracts were already established the contracts have also been reviewed with the relevant suppliers.

The main categories of expenditure identified by the University are outlined in the table below including a summary of the main contracts awarded where there is considered to be a potential risk:

Property & Facilities Management	Corporate & Academic Services	IT and Digital Services (ITDS)
All construction, estates and facilities management contracts have included Modern Slavery Due Diligence and all suppliers have agreed to the University Code of Conduct for Recruitment and Labour in the Supply Chain	Sustainability and Business Ethics forms a part of the standard tender evaluation process, which are scored. This often includes a review of the Modern Slavery Statement of the supplier, if the size of organisation requires one, or specific details provided within the tender submission in order to gauge how the supplier is tackling modern	ICT equipment (procured through London Universities Purchasing Consortium or Crown Commercial Services) includes contract clauses and due diligence conducted by Electronics Watch on production factories globally. We utilise the knowledge and resources of Electronics Watch through our procurement

	slavery through its policies, due diligence and training.	practices and contract management.
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Actions taken by our suppliers and monitored through contract management:

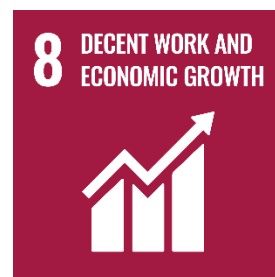
Property & Facilities Management	Salisbury FM, the University’s new Estates Maintenance contractor, recently engaged with their supply chain to improve their level of reporting and undertake more proactive exercises in relation to counteracting modern slavery if identified.
	All Construction and FM contracts awarded have included due diligence in line with the Procurement Policy. Ensuring those suppliers who also have a responsibility under Section 54 of the Modern Slavery Act are taking their responsibilities forward and raising awareness with those smaller suppliers to which the act is not applicable directly.
Corporate & Academic Services	For those suppliers whose supply chain is located in Asia, often the countries of operation do not have a Modern Slavery legislation. To combat this our suppliers are required to uphold our own principles and may not be able to sub-contract under the Agreement. If they are allowed to sub-contract, the main Supplier is responsible for all the sub-contractors’ ‘acts and omissions’.
IT and Digital Services (ITDS)	To better inform the University’s ITDS procurement, we made sure that no purchases were with companies identified by our partner Electronics Watch to have labour abuses discovered in their factories. Electronics Watch conducted one regional risk assessment, screened 56 factories, documented and responded to worker’s rights complaints in nine factories, screened two major OEMs and conducted eight full compliance investigations.
CoSector Supply Chain Monitoring	CoSector continue to work closely with supply chain partners, and followed up with one partner who had previously inspected working facilities in Vietnam, considering labour rights, health and safety, working conditions, environment and business ethics as part of the supply chain due diligence. There were no discoveries of abuses in those facilities

9.0 Plans for the year ahead

The University will continue to support and promote the Modern Slavery Act and deliver upon our goals set out in this statement. Some of the specific activities we will work on in the upcoming year are:

- Aim to achieve the University’s first score under the ISO20400: Responsible Procurement standard, to formally assess the University’s embeddedness of modern slavery mitigation activity, amongst other activities, in its procurement processes. This assessment will give feedback to identify areas of improvement for modern slavery mitigation, and provide a benchmark to supersede in FY21/22.
- Make sure modern slavery is explicitly referenced in the University’s new Procurement Policy, to ensure all members of staff are aware they must consider the risk of modern slavery in all purchases, and develop the contract or purchase appropriately to mitigate any risk.

- The Procurement Team will continue to monitor categories identified as higher risk and begin to create a centralised modern slavery risk register to help focus efforts of modern slavery identification and mitigation.
- Continue to work towards achieving [United Nations Sustainable Development Goal 8.7](#): “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”.
- Further integrate modern slavery guidance into the University’s in-house training courses, such as “Principles of Effective Contract Management”.
- Continue to fund training for procurement staff to reach or maintain Chartered Institute of Procurement and Supply (CIPS) Membership, which includes specific modern slavery awareness and mitigation methods. Staff who have achieved Membership of CIPS previously must also prove they have taken the CIPS Ethics Test every year.
- Strengthen efforts to investigate, record and highlight, as precisely as possible, where all goods are assembled and components produced with our current and new suppliers, to highlight risk of modern slavery and take action where necessary.



This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the University of London’s modern slavery and human trafficking statement for the financial year ending 31 July 2020.

Approved by:

Wendy Thomson, University of London Vice-Chancellor

And the University of London Board of Trustees:

Date: 14 October 2020