



University of London

Anti-Slavery and Human Trafficking Statement 2018-2019

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 2019, 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

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 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 3 broad procurement categories:

1. Property & Facilities Management
2. Corporate & Academic Services
3. Information and Communications Technology (ICT)

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, an independent organisation working to achieve respect for labour rights in the global electronics industry through socially responsible purchasing.
- We have developed a formal contract management system, evaluating contract performance at implementation, on an ongoing basis annually at a strategic level. Each performance review is based upon agreed performance indicators, including evaluation on contract sustainability and supply chain 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.

"The University of London 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*

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 Procurement Director and to their line manager or budget holder. In emergency situations the relevant authorities must be contacted in the first instance. Management and the Procurement Director 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. The University of London is a member of Universities Against Modern Slavery Alliance (UAMSA), established by King's College London. UAMSA is a collaboration between universities which aims to raise awareness of the issue of sustainability and labour exploitation in supply chains. It brings together the researchers, staff who procure as well as students to raise greater awareness of this issue and to have an impact on the issue of modern day slavery in our supply chains. 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:

- We continue to collaborate with other Member Institutes, Universities and Research Groups, such as the Business Human Rights and Environment Research Group to raise awareness, apply best practice and work with business to influence better behaviours and transparency
- We raise 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.
- The University's Procurement Director is responsible for supply chain management transparency and anti-slavery initiatives.
- 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.

- We 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.
- We 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 2018-2019

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 these contracts have also been reviewed with the relevant suppliers.

We have worked with colleagues from across the sector and purchasing consortia to raise awareness of Modern Slavery and provide training. Working with colleagues in the LUPC Responsible Procurement Network, we will develop and deliver a short training course on Contract Management & Modern Slavery

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 | Information and Communications Technology (ICT) |
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| All construction 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 | <p>In completed and ongoing tenders for library services, print services and academic journal production, all prequalification & due diligence, tender and final contracts were prepared with due regard to the Modern Slavery Act</p> <p>We are in the process of awarding contracts for the supply a variety of professional services. Through the prequalification questionnaire and specification, suppliers were required to state if they complied with the MSA2015 and provide details of how they manage slavery within their supply chains.</p> | <p>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.</p> <p>We utilise the knowledge and resources of Electronics Watch through our procurement practices and contract management.</p> <p>We have also worked in collaboration with other HEIs to raise awareness with an SME supplier, upon identification of a potential risk. This resulted in the supplier reviewing their processes and ensuring appropriate safeguards were put in place.</p> <p>Whilst no instances were discovered, process improvements were positively implemented.</p> |

Actions taken by our suppliers and monitored through contract management:

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| Property & Facilities Management | <p>Our catering supplier (Aramark) has confirmed that as a member of SEDEX, it is a requirement for all suppliers to undertake a SEDEX Audit. The audit comprises a questionnaire which focuses on supplier sourcing and labour practices with an emphasis on labour rights, health & safety, the environment and business ethics. Aramark initially focussed on Tier 1 suppliers, representing approximately 95% of the supplier base. For those who have completed the audit and returned a risk assessment score, no issues pertaining to MSA have been identified. The review is now progressing to tier two suppliers.</p> |
| | <p>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 which the act is not applicable directly.</p> |
| Corporate & Academic Services | <p>Through our Travel Management Provider, due diligence has been conducted on a higher number of hotels globally. This is considered a medium to high risk area in relation to a variety of Modern Slavery risks.</p> |

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| | Performance reviews were carried out for a number of key contracts, with no reports of increased risk or instances of slavery or human trafficking. For instance, both UoL’s library management services (LMS) and international couriers, there were no instances of slavery or human trafficking reported in either contract |
| Information and Communications Technology (ICT) | ICT Hardware, most of which is procured through London Universities Purchasing Consortium. However, this category of products remains a higher risk. The supply chain for these products is complex and multi-layered, with significant risks cited from the sourcing of cobalt for lithium batteries to the production line for product manufacturing. We will continue to work with key partners to raise the awareness of issues connected to Modern Slavery in this category. |
| CoSector Supply Chain Monitoring | CoSector continues to work closely with supply chain partners, having inspected working facilities of a supply chain provider in Vietnam, considering labour rights, health and safety, working conditions, environment and business ethics as part of the supply chain due diligence. |

9.0 Plans for the year ahead

We 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:

- Launch the Supplier Code of Conduct and a set of supplier policies, including how we expect our supply chain to support our values and Corporate Social Responsibility Statement.
- Supplier policies will also reinforce our commitment to treat people in our business and supply chain fairly and our expectations from our suppliers to support this expectation. This includes working with our suppliers to actively collaborate and promote the objective of eradicating modern slavery.
- Launch a ‘Responsible Procurement Toolkit’ based upon the ISO20400 that will include the Modern Slavery Act, for the University’s purchasing staff members and other stakeholders.
- Deliver a series of bite-sized procurement training sessions to launch the Responsible Procurement Toolkit and promote our Modern Slavery Statement.
- We will continue to monitor categories identified as higher risk and conduct a survey of the University’s supply chain to find out their awareness and planning regarding modern slavery
- Further integrate modern slavery guidance into the University’s in-house training courses, such as “Principles of Effective Contract Management”.

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 2019.

Approved by the Board of Trustees on: 30 January 2020