



University of London  
Anti-Slavery and Human Trafficking Statement 2017-2018

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 Procurement Team during the year ending 31 July 2018, 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. Traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude and inhumane treatment. The scale of modern slavery globally is significant. The UN's [International Labour Organisation](#) estimates that [21 million people around the world are trapped in some form of modern slavery](#). In the UK, estimations from the Home Office are that the figure is around 13,000 victims; modern slavery crimes are being reported across the country and year on year increases in the number of victims identified continues. Whilst a large number of active organised crime groups are involved in modern slavery, it is also committed by individual opportunistic perpetrators.

As a University with an expansive international student base, 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 fairly, this includes working with our suppliers to actively collaborate and promote the objective of eradicating modern slavery.

This is the third annual statement for the University of London. Over the previous year, we have continued to review and assess the risk of Modern Slavery in our supply chain and strengthen our work to identify any risks, ensuring our teams and suppliers have the knowledge and are equipped to take the most effective responses to that risk. The University of London Procurement Team is committed to tackling modern slavery within our procurement, contract management and supply chain management operations. We do this through the development of responsible purchasing policies, carrying out due diligence and risk assessments in purchasing and contract management and creating awareness of modern slavery amongst the procurement and contract management community at the University. We also use our strategic planning processes to identify supply chain risks for future procurement activity, possible changes in legislation and supplier improvement through efficient and effective contract management.

### **1.0 The University of London & Our Supply Chains**

The University of London is one of the oldest, largest and most diverse universities in the UK. Established by Royal Charter in 1836, we are recognised globally as a world leader in higher education. The central University, in addition to its Central Academic Bodies, provides a suite of innovative high-quality academic support and professional services, and manages a valuable property portfolio.

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subsidiaries, all wholly owned by the University are; CoSector Limited, Senate House Services Limited and Senate House Services One Limited.

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 both the University's curriculum and our indirect or corporate requirements; 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, mainly for 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.

## 2.0 Developing Policy & Due Diligence

All suppliers who are seeking to do business with the University must agree to our Corporate Social Responsibility Statement. 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:

- In addition to the University's CSR statement, the University of London Procurement Policy references the Modern Slavery act as part of effective supply chain management
- For lower value contracts suppliers self-certify their business and state that they adhere to the University's CSR policy. In 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 vulnerable 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 federated membership of Electronics Watch, an independent organisation working to achieve respect for labour rights in the global electronics industry through socially responsible purchasing.
- 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 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 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*

### **3.0 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 and take 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. However 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.

### **4.0 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 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, the 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.
- To raise awareness, the Procurement Team is developing a procurement training course on Responsible Procurement, 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.

## 5.0 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.

## 6.0 Our Achievements in 2017-2018

Throughout the year the University awarded several contracts for products, services and works. Observing the principles in 2.0 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 were 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 some of the main contracts awarded or actions taken through contract management:

Property & Facilities Management	<p>Our catering supplier (Aramark) has confirmed that as a member of SEDEX (<a href="http://www.sedexglobal.com">www.sedexglobal.com</a> a collaborative platform for sharing responsible sourcing data on supply chains, used by more than 38,000 members in over 150 countries). All suppliers are required 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 &amp; 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.</p> <p>The review is now progressing to tier two suppliers.</p>
	<p>All Construction 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>
	<p>Furniture Contract, it is a requirement of the furniture contract for the supplier to undertake full due diligence on their supply chain including audits of factories.</p>

<b>Corporate &amp; Academic Services</b>	Travel Management Company, who undertake due diligence on suppliers (including hotels, identified as an area of international risk) within their supply chain, including assessing and reviewing the risk on a regular basis. Suppliers are required to demonstrate compliance with their standards and expectations in a range of core areas, including Modern Slavery and Human Trafficking identification and prevention.
<b>Information and Communications Technology (ICT)</b>	CoSector have inspected working facilities of a Tier Two supply chain provider and their premises in Vietnam; considering labour rights, health and safety, working conditions, environment and business ethics as part of the supply chain due diligence.
	ICT Hardware (procured through London Universities Purchasing Consortium, all ICT hardware is procured with contract clauses in line with the Electronics Watch recommended clauses)

**Other actions or achievements include:**

Mapping our global expenditure and categories of expenditure to continually assess the risk of Modern Slavery within our supply chain. We then use this to evaluate and review risks of Modern Slavery by geographical region, category of expenditure, as well as with the suppliers.

We communicate and inform our suppliers of our expectations of them in helping us to ensure transparency in our supply chain. This is particularly important with suppliers with a turnover below the £36million threshold, as this raises awareness of any potential issues.

**Raising Awareness through collaboration**

We are an 'Affiliated Member of Electronics Watch', through our membership of London Universities Purchasing Consortium (LUPC)

Members of the Procurement Team have also taken on roles to promote responsible procurement within the sector, such as:

Chair LUPC Responsible Procurement Group

And membership of The Higher Education Procurement Association, Responsible Procurement Network

**Raising Awareness through training:**

To ensure a high-level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff, through a variety of media. We have:

- Developed an in-house training session for staff to raise awareness
- Integrated MSA into contract management training course
- Electronics Watch Webinars - for buyers of IT equipment
- eLearning module available for all staff

This training covers, how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available. How to **identify the signs** of slavery and human trafficking. The initial steps **to respond** to a suspected case of slavery or human trafficking. How to **escalate** potential slavery or human trafficking issues to the relevant parties within the organisation and how to work with suppliers to **mitigate** the risk. What steps we should take if suppliers or contractors do not implement anti-slavery policies in high risk scenarios.

**7.0 Plans for 2018-2019**

The Procurement Team 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:

- Develop 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.
  - Complete a Responsible Procurement Toolkit 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.
  - The Procurement Team 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.
  - Integrate modern slavery guidance into the University's in-house training courses, such as "Principles of Effective Contract Management".
  - Working with colleagues in LUPC Responsible Procurement Network to deliver training and continue to raise awareness.
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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 2018.

**Approved by:**

**Peter Kopelman, University of London Vice Chancellor  
And the University of London Board of Trustees**

**Date: November 2018**