

UNIVERSITY OF LONDON

University of London

Anti-Slavery and Human Trafficking Statement 2020-2021

This statement is published in accordance with section 54 of the Modern Slavery Act 2015 and covers the activities of the University of London and its trading subsidiaries. It sets out the steps taken for the year ending 31 July 2021 to ensure transparency in our supply chain and prevent modern slavery.

The University of London Structure, Organisation and Supply Chain

The University of London offers students around the world life-changing access to education, whoever and wherever they are. With a mission to transform lives through knowledge, it delivers high quality academic programmes to all corners of the globe, bringing benefits to society through its research in the humanities and social sciences, and leveraging intellectual connections through public engagement which transcend geographic, social, and cultural barriers.

The University of London educates more than 50,000 distance learners annually in 190 countries and has over 500,000 alumni across the globe. It pioneered the concept of 'education for all' when it was founded in 1836, and has continued to innovate ever since, consistently reimagining learning, teaching and research to anticipate the needs of the future.

At the heart of the University is collaboration: it is a Federation of 17 London-based Member Institutions of outstanding reputation.

Built on this exceptional knowledge base, the University's distance and flexible learning provision enables access to internationally respected undergraduate and postgraduate qualifications from anywhere in the world, changing the lives and prospects of hundreds of thousands of people.

Modern slavery concerns are part of this golden thread of operations from the most senior decision makers to the rest of staff throughout the University. This golden thread weaves through the organisational structure and wholly owned active trading subsidiaries.

[University of London Organisation Structure \(no link yet\)](#)

Understanding Our Supply Chain

The University has a diverse breadth of purchasing activity, which is managed by the Procurement team. The team recognises that it draws goods and services from across the globe and classifies its activities into three broad categories.

The goods and services the University purchases are then broken down further into 23 sector standard Procurement Higher Education (ProcHE) broad codes, and 461 detailed codes, developed by the Higher Education Procurement Association (HEPA).

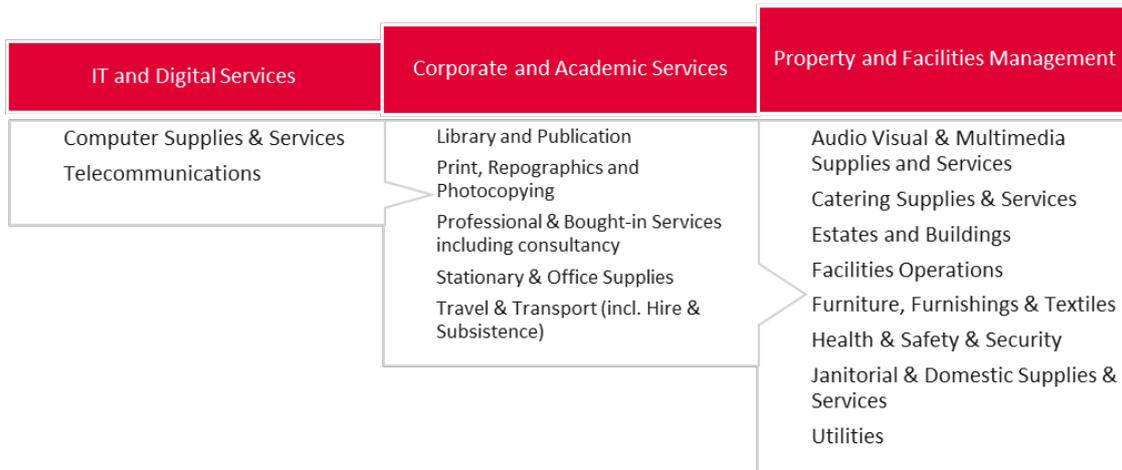


Figure 1 HEPA Level 1 Codes

The top five categories in order of spend were:

01. Non-influenceable Spend
02. Professional and Bought-in Services
03. Estates and Buildings
04. Catering Supplies and Services
05. Computer Supplies and Services

In the 2020-2021 financial year, the University spent a grand total of £58,769,310.

It remains our understanding that most contracts consist of a one-tier structure of client to supplier, with a minority of contracts involving deeper and broader subcontracting of products, works or services that are more complex.

Most of the University suppliers are headquartered in the UK. However, suppliers often import products and services from international sources, and we recognise that a significant amount of purchased goods are produced and assembled outside of the UK, sometimes in higher risk countries.

Due Diligence, Risk Assessments and Responses

The University conducts modern slavery due diligence on its supply chain based on our assessment of the potential risk and the potential value of the contract under consideration, often using the Pareto Principle to direct resources appropriately.

Supply Chain Modern Slavery Risk Profile

For the first time, the University used a resource developed by HEPA in February 2021 to conduct modern slavery risk analysis of the commodities and services the University purchases. This helped in preliminary categorisation of spend as low, medium or high-risk, followed by further investigation to corroborate this profile and prioritise modern slavery risk mitigation.

We have identified that most of the University's spend can be determined as low risk:

Modern Slavery Risk	Sum of Amount	% Grand Total
High	£ 11,544,592.04	19.64%
Low	£ 45,604,661.75	77.60%
Medium	£ 1,620,056.32	2.76%
Grand Total	£ 58,769,310.11	100%

Of the high risk spend identified, the top five categories within it represented over 80% of the total sum, allowing the University to effectively continue focussing efforts to combat modern slavery. These categories are mostly Estates and Facilities Management and recruitment based. However, as noted below the University has taken concerted efforts to reduce the risk of modern slavery in our estates and facilities operations and our recruitment practices hire low risk professional services.

COVID-19 and Personal Protective Equipment

We are also cognisant of the impact of COVID-19 over this reporting period, and the significant amount of personal protective equipment (PPE) that was required to keep the staff and students safe in our campuses and buildings. Due to significantly high demand for these items in the sector, the University was conscious of how companies may loosen labour condition safeguards in order to win business. Therefore, where possible, the University made sure to procure these goods from reputable and trusted sources, to reduce the risk of such items being made under illegitimate conditions. No instances of modern slavery were brought to the University's attention, and responsible teams remained vigilant so that they could act immediately to resolve issues if they arose.

Mitigating Actions

This includes a combination of the following:

- Highlighting potential risks relating to Modern Slavery with suppliers throughout the procurement cycle, for example any industry news, and maintaining dialogue about mitigation, particularly with those who have annual turnovers above the Modern Slavery Act 2015 reporting requirements of thirty-six million pounds.
- During tendering processes, all suppliers must complete prequalification questionnaires to state they have not been convicted of an offence under section 2 or section 4 of the Modern Slavery Act 2015. Failure to confirm this can result in exclusion.
- Use framework agreements with specialised terms and conditions to combat Modern Slavery. For example, an IT Framework Agreement with [Electronics Watch](#) Terms and Conditions that require appointed contractors to perform due diligence to achieve supply chain transparency, collaborate with independent monitors, and remedy breaches of labour rights and safety standards.

Investments

The University has two pension schemes that staff can opt into. These are the Superannuation Arrangements of the University of London (SAUL) and the Universities Superannuation Scheme (USS). We ensure that both schemes are signatories of the United Nations Principles for Responsible Investment, to identify any potential risks of modern slavery incorporated in new and ongoing investments.

Organisational Policies

The University has a diverse range of policies which are overseen at the highest levels of governance to ensure total commitment by the organisation to eradicating modern slavery in its supply chains. All these documents are available for all staff in our internal intranet, and some are available on our [public website](#).

Public Interest Disclosure Ordinance

The Public Interest Disclosure Ordinance is available for all staff to raise concerns about modern slavery, among other issues, if identified, without fear of victimisation. This Ordinance assists the University in acting upon and, if necessary, investigating a complaint, while also demonstrating the University maintains the highest standards of conduct when interacting with its supply chains.

The University of London Procurement Policy October 2018

This Procurement Policy dictates the overarching procurement rules that must be observed by all staff when purchasing or placing contracts on behalf of the University. Inherent in this is the need for further due diligence on potential suppliers where higher values and risk are involved.

This Policy also sets out the commercial and ethical considerations regarding modern slavery that must be taken in the purchase of supplies, services and works.

Code of Conduct for Recruitment and Labour in the Supply Chain

This Policy is a statement included with all major tenders, which seeks to ensure that all suppliers, and subcontractors, working with us to deliver works, goods and services actively address and work to eradicate all forms of modern slavery in their supply chains in line with the [Ethical Trading Initiative Base Code](#).

"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 2018

Donations Acceptance Policy

The Donations Acceptance Policy governs how the University welcomes genuine philanthropic donations, which support the values of the University and enable it to advance its mission, support its strategic plan and enhance its programmes and services.

As part of this, the University has an Ethical Acceptance of Donations Policy, where all potential donations of £10,000 and above automatically require an ethical screening of the donor. This policy mitigates whether there might have been modern slavery present in the activities that generated the asset or money to be given.

Measuring Effectiveness and Planning for the Future

Contract Management

The University employs a contract management strategy that evaluates performance at implementation, on an ongoing basis and at an annual, strategic level. Each performance review uses agreed performance indicators, including evaluation on contract sustainability and supply chain management.

At all stages of the procurement and contract management process, the University shall use its best endeavours to challenge suppliers that do not meet 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 provide evidence of improvement, the University may terminate the business relationship.

Risk Assessment and Management

A key discipline among operational staff is the identification and management of risk. Staff members manage risk at all stages of the sourcing and contract management cycle by taking appropriate action to mitigate or remove risk to the University. Procurement professionals must observe guidance on modern slavery established by the Chartered Institute of Procurement and Supply (CIPS).

- Staff engage with our buyers, contract managers, senior management and decision makers at the University, and our suppliers to learn where supply chain risks may lie.
- All 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 use category management principles to leverage specialist knowledge in identifying and influencing spend at the University, allowing us to plot how we spend in more vulnerable markets and how to mitigate this.
- Buyers and contract managers are expected to report concerns to the Finance Director and to their line manager or budget holder. In emergencies, the relevant authorities must be contacted in the first instance. Management work together to act upon these risks.

Research, Training and Capacity Building

As the strategic knowledge base for procurement at the University of London, the Procurement Team maintains awareness of modern slavery legislation, developments 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 raised awareness amongst the procurement and contract management community and collaborated to share best practice.
- The Procurement Team worked in collaboration with other universities and external bodies such as the London Universities Purchasing Consortium (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 Procurement Team undertook surveys of the University's supply chain to find out their awareness and planning regarding modern slavery.

Higher Education Courses

The University of London coordinates several higher education programmes which specifically address modern slavery concerns and the theories to tackle them, training professionals to make a difference in the world.

- A module in Environmental and social impact assessment, in MSc Public Policy and Management.
- MSc, PGDip and PGCert in Supply Chain Management and Global Logistics.
- SAS MPhil/PhD Programmes through the Institute of Commonwealth Studies in Human Rights.

Strategic Planning and Category Management

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 are developed on an ongoing basis to stay aware of market, product, and service vulnerabilities.

- The Procurement Team aligned operations with a Contract Register, to review and plan future procurement activity and identify resource needs. The Plan was used to identify both sustainable sourcing opportunities and supply chain vulnerabilities such as modern slavery.
- Procurement worked to create links between departments including Sustainability to ensure Modern Slavery considerations and actions are included in the University's other key strategies and policies, where relevant.
- Procurement further developed contract management guidance with an emphasis on supply chain management and Responsible Procurement.
- In future, the Procurement Team will continue its review of the University's existing supply chains, and update procurement KPIs and risk registers to include references to modern slavery.

Our Achievements in 2020-2021

Throughout the year, the University awarded dozens of contracts for products, services, and works. All suppliers bidding for these opportunities 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 these have also been reviewed with the relevant suppliers.

Major Actions taken by our suppliers and the University:

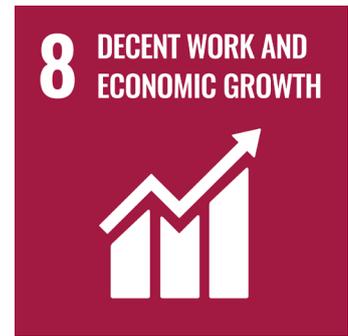
Estates & Facilities Management	Cleaning and Security staff were moved to direct PAYE employment by the University. This gives the University greater control over the recruitment process, strengthening our modern slavery due diligence capabilities. The waste removal, feminine hygiene, cleaning equipment, cleaning consumables, laundry services, window and specialist cleaning also transitioned into direct management by the University. This reduced barriers to conducting modern slavery due diligence in our supply chain by turning Tier 2 suppliers into Tier 1.
IT and Digital Services (ITDS)	Our supplier who manages the IT Service Management Tool has agreed to include clauses in their terms and conditions committing to the eradication of modern slavery.

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 and provide a benchmark to supersede in FY22/23.

- Modern slavery will be explicitly referenced in the University’s updated 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.
- Continue to work towards achieving the [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”.
- Sign up to the Home Office’s Modern slavery statement registry and upload all future statements to it.
- 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 act where necessary.
- Continue to organise and deliver further modern slavery awareness and mitigation training among contract managers where appropriate.



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 2021.

Approved by:

Wendy Thomson, University of London Vice-Chancellor

And the University of London Board of Trustees

Date: 13 October 2021