ANTI-SLAVERY TRANSPARENCY STATEMENT

Introduction

This statement constitutes the University of Lincoln’s anti-slavery and human trafficking statement for the financial year ending 31st July 2018. The University is legally required to publish an annual statement by section 54 of the Modern Slavery Act 2015.

Modern slavery is an overarching term to describe all forms of contemporary slavery including human trafficking, slavery, servitude, forced, bonded and child labour. This statement sets out the steps the University has taken, and will take in the coming year, to tackle this issue. It covers both our own workforce and how we will address the prevention of modern slavery in our supply chains.

We have robust recruitment procedures in place to ensure that there is no possibility of slavery in our institution’s workforce and we are committed to using our procurement activities to combat modern slavery in our supply chains.

Organisational structure

The University of Lincoln is a Higher Education Corporation and, as an exempt charity, operates on a ‘not for profit’ basis. Its primary activities are the provision of world class teaching and research. The University is organised into four academic colleges (Colleges of Arts, Science and Social Science and the Lincoln International Business School) which are supported by a number of Professional Services (non-academic) departments.

Our recruitment practices

We directly employ circa 1,800 employees and we have a thorough set of employment related policies and procedures that prevent any possibility of modern slavery occurring within our workforce. Our Human Resources (HR) Department and recruiting managers follow a recruitment policy and processes which are regularly reviewed for compliance with legislation.

At the time of application, potential employees have to provide ‘right to work’ information which is checked at interview by our HR team. The majority of interviews are conducted face-to-face which ensures that individuals have freely chosen to attend. All application forms are verified as being the applicant’s own information, including taking a copy of the interviewee’s original passport and any additional ‘right to work’ documentation (where applicable).

Where interviews are conducted via Skype or other electronic means, the candidate is required to present their original passport and other additional ‘right to work’ documentation (where applicable) in person to HR before their start date or on their first day. All employees receive a written contract of employment. HR also provide information to all new employees on their statutory rights including sick pay, holiday pay and other benefits they may be entitled to.

These actions combined with the University’s commitment to pay the Living Wage mean that we can be confident in stating that there is no modern slavery in our directly employed workforce.

Our supply chains

The University purchases from over 2,200 different suppliers each year. The suppliers who we directly purchase from are known as our 1st tier suppliers. These 1st tier suppliers, in turn, trade with their own supply chains (2nd tier, 3rd tier and so on) to produce and offer the goods,
services and works that the University requires. Our 1st tier suppliers range from locally based micro businesses through to large global companies.

We have great diversity in the types of purchases we make through our supply chains. Our ICT and Estates departments are responsible for many of our high value contracts with suppliers. ICT requirements include IT systems, hardware and telecoms; Estates have requirements including capital works, facilities management, building maintenance and energy. Our other high value expenditure categories include travel, laboratory equipment and consumables, library materials, food supplies and professional services.

The vast majority of our purchases are from suppliers based in the UK. The Walk Free Foundation (who campaign on modern slavery) have profiled modern slavery risks and concluded that UK based industrial supply chains are not a common source of modern slavery. Whilst we cannot categorically state that there is no modern slavery in our 1st tier suppliers, we assess the risk of this as being low.

Only a small proportion of the University’s purchases have been from overseas suppliers in the last financial year. Typically the overseas suppliers we use operate in high-tech industries in developed countries or are providers of professional services; the risk of modern slavery is less prevalent in these areas.

Suppliers in certain countries can pose a greater risk of modern slavery occurring. The Walk Free Foundation have identified ten countries which have the highest prevalence of modern slavery. In the last financial year, the University has only had one single engagement (for international student recruitment services) of a supplier based in one of these ten countries.

**Actions taken in this financial year**

A number of actions have been undertaken by the University this year in regard to modern slavery, these are as follows:

**Collaboration with NEUPC**

The University is a member of the North Eastern Universities Purchasing Consortium (NEUPC) buying group. NEUPC aggregates the purchasing power of universities to enhance value for money and also to positively influence supplier behaviours. We have participated in a Sustainable Procurement working group with colleagues from NEUPC, and its other member universities, to share and exchange good practice around anti-slavery measures. Anti-slavery has been one of the four priority areas for this group and we have met quarterly to discuss and review approaches.

**Supplier information**

We have updated our supplier-facing internet microsite with information to raise our supplier’s awareness of their legal obligations regarding anti-slavery and to signpost to good practices they can adopt in their businesses. The supplier microsite provides suppliers with a range of information on the University’s procurement processes.

**CIPS training**

All of the staff in our Procurement Team have completed the Chartered Institute of Procurement & Supply’s (CIPS) ethical procurement e-learning and online test. This learning is designed to provide procurement specialists with enhanced knowledge of human rights issues in supply chains and how to support the combatting of modern slavery. CIPS, who are
the professional body for procurement in the UK, have partnered with leading specialists in anti-slavery to inform and develop the course content.

Facilities management tender

We have issued an invitation to tender (ITT) for our soft facilities management services (cleaning, security, portering services). The contract will start in 2019 and the successful supplier will employ over 100 of their own full and part-time staff to deliver the contract requirements. Given that this is potentially a higher risk area, we have included in the ITT that the successful supplier is required to make disclosures on the anti-slavery actions it is taking in regard to staff deployed on this contract. The University’s contract terms will also require the supplier to pay staff working on the contract the Living Wage Foundation rates of pay.

International agent’s terms and conditions

The University’s International Office have updated the template terms and conditions which they use when appointing international agents to cover matters related to the Modern Slavery Act. International agents support the University’s overseas student recruitment and marketing activities operating in a wide range of countries.

Future plans

In the next financial year (2018/19), the University intends to take the following actions as part of our initiatives to play a role in combatting modern slavery:

IT hardware category review

The Walk Free Foundation’s Global Slavery Index 2018 identified that the products (imported into the UK) which are at most risk of being produced with slavery in the supply chain are laptops, desktop computers and mobile phones. As a result we will engage with our suppliers of these products to better understand the anti-slavery actions they are taking and how we can best work together with our supply base on this issue.

Construction category review

The construction industry is a sector with a higher than average risk of modern slavery occurring due to its need for large amounts of manual labour resources. There is also further risk of slavery occurring in the supply chain of certain building materials. Construction is a major spend category for the University and we will engage with our construction partners (contractors/buying groups) to review the anti-slavery measures they are taking. We will also review the due diligence that the University undertakes when appointing contractors for our construction projects.

Temporary staff

We are due to tender the replacement for our current contract for temporary administrative and clerical staff, which will expire in 2019. As part of this tender process, we will undertake appropriate due diligence on tenderers bidding for the new contract. This will ensure that their recruitment practices for identifying and registering candidates are appropriate and do not introduce any forced labour related risks for the University in subsequently hiring such staff.

New supplier form

When adding new suppliers to our Finance system database, the University uses a form to obtain various information from each new supplier to establish their supplier record. We will
revise this form to raise the issue of the Modern Slavery Act and its obligations with suppliers when we first engage with them. The purpose of this will be to act as an awareness raising mechanism, rather than a method of supplier selection.

**Spend analysis**

Each year we undertake an analysis of the University's external supplier expenditure. This provides a comprehensive picture of what we buy and who we buy it from. We will again use this information to identify any changes in our buying patterns and the countries that we purchase from. This will help to inform any newly emerging modern slavery risks that the University will need to address.

This statement has been approved by the University's Board of Governors and will be revised annually.

**Signed by:** Professor Mary Stuart

[Signature]

On behalf of the University of Lincoln
Date: 30 October 2018