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 2020. 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.

The University also has a subsidiary company (UOL Services Limited) through which a proportion of its non-academic and support staff are employed.

Our recruitment practices

We employ circa 2,400 employees (this figure includes associate lecturers) 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 stage by our HR team. Before Covid-19, the majority of interviews were conducted face-to-face which ensured that individuals had freely chosen to attend. Following government guidelines, all interviews now take place remotely using either Skype or Microsoft Teams. However, the same checks (including ‘right to work’) remain in place and, other than by exception (for reasons of a reasonable adjustment), candidates are visible to the panel. 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).

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

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 construction works, facilities management, building maintenance and energy. Our other major expenditure categories include travel, laboratory equipment and consumables, library materials, food supplies and externally provided professional services.

The University purchased from nearly 2,400 different suppliers in the last financial 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 (at the 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. Whilst we have not mapped our supply chains, it is clear that each tier can open up a supply network within which multiple suppliers are involved, to a greater or lesser extent, in supplying to the University. For a project such as the ongoing construction and fit out of our new Medical School building there are hundreds of companies involved in the extended supply chain (contributing a mix of labour, materials, plant/equipment hire and professional services).

The vast majority of our 1st tier suppliers are based in the UK where industrial activity is not a common source of modern slavery. Only a small proportion of the University’s purchases have been from overseas suppliers in the 2019/20 financial year.

Typically, the overseas suppliers we have directly purchased from either operate in high-tech industries in developed countries or are providers of professional services; the risk of modern slavery is less prevalent in both these areas. Suppliers in certain countries can pose a greater risk of modern slavery occurring.

The evidence based Global Slavery Index (published by the Walk Free human rights organisation) has identified ten countries which have the highest vulnerability to modern slavery. In the last financial year, the University has engaged with suppliers from only one (Pakistan) of these ten countries. Those suppliers all provided student recruitment and marketing services, which are at much lower risk of slavery compared to the manufacturing sector (where it is more prevalent). The University also contracts with these service providers on terms and conditions which address anti-slavery.

In some areas of our spend, such as ICT hardware, manufacturing activity will take place entirely overseas with the products being shipped in a finished state into the UK. Supply chains in such cases are multi-layered and multinational. It is not practical for the University to map such complex supply chains and we will instead seek to work with our 1st tier suppliers to encourage them to take positive action on managing modern slavery risk further down the supply chain.

**Actions taken in this financial year**

A number of actions have been undertaken by the University in the last financial year (2019/20) in regard to anti-slavery, these are as follows:

**Office stationery tender**

Certain office stationery products can be produced in countries where occurrences of modern slavery are more prevalent. This risk can be exacerbated by the stationery supplies market being highly price sensitive and some unscrupulous manufacturers may seek to use unacceptable labour practices in order to compete on price.

The University’s contract for office stationery was re-tendered this year and a new supplier has been appointed. As part of the tender process, each bidder was questioned on their
approach to ensuring there is appropriate anti-slavery due diligence within the supply chain that will be providing stationery products to the University.

In the short term, our stationery purchases are much reduced as a result of Covid-19 and the resultant increase in staff working from home to support social distancing. However, we will continue to engage with our newly appointed supplier through the three year contract term on the issue of anti-slavery.

Staff training

Staff working in the University’s Procurement Team have completed an e-learning course on ‘Protecting Human Rights in the Supply Chain’ hosted by HEPA (who are the recognised sector body for higher education procurement). The course is designed specifically for staff working in public procurement roles and it covered a range of topics relevant to undertaking anti-slavery measures in a procurement environment such as that of the University.

Monitoring good practice

We have continued to monitor good practice around how procurement can be used to mitigate modern slavery risks. This has involved reviewing the anti-slavery statements prepared by other universities and being subscribed to relevant good practice articles. A review of guidance published by the Chartered Institute of Procurement & Supply and other bodies who are engaged in providing advice and guidance on anti-slavery activities has also been undertaken.

Spend analysis

As in previous years, we have again undertaken an analysis of the University’s external supplier expenditure. This provides a comprehensive picture of what we buy, and who and where we buy it from. Analysis such as this helps us to identify any new modern slavery risks as a result of our expenditure patterns. This analysis flagged that we had engaged suppliers in Pakistan for the first time and prompted some preliminary investigation into these purchases to consider potential risks.

Future plans

In the next financial year (2020/21), the University intends to take the following actions as part of our initiatives to play a role in combatting modern slavery:

New travel contract – hotels review

We will be tendering for our corporate travel contract which covers travel (including hotels, flights and trains) both domestically and overseas. Whilst Covid-19 will inevitably impact the future travel activity of University staff, historically staff travel has been a significant spend area for us.

The hotel sector is at a higher risk of labour exploitation due to the manual labour (i.e. housekeeping, kitchen staff etc.) involved. Hotel staff employed to do this work are potentially vulnerable to exploitative working conditions. Last year, even with Covid-19 suspending business travel for an extended period, the University still purchased over 1,100 hotel nights. Once our new travel contract has been awarded, we will work with the appointed supplier to understand how we can best address anti-slavery within our hotel supply chain.
IT Hardware procurement

We will be undertaking the tendering of two significant IT hardware contracts this year. The manufacturing of electronics componentry and the final assembly of IT equipment are known to present risks of slavery within their supply chains. Therefore, we will undertake appropriate anti-slavery due diligence as part of the procurement exercises for these two new contracts.

The Bridge – construction project tender

The Bridge project involves the creation of an Advanced Engineering Research and Development Centre which will support innovation within the use of advanced manufacturing materials. A key part of the project, which is supported by external funding, is a 750m² new two storey building to be constructed on the Brayford campus.

Whilst workforces on construction sites in areas such as Lincoln would appear to be at relatively low risk of exploitation, the complex supply chains for goods and materials needed for construction works do pose a more significant slavery risk. These risks have been acknowledged by the Chartered Institute of Building (CIOB) who have sought to raise awareness on this matter.

Therefore, as part of the procurement of a main contractor for The Bridge project, we will consider how best to address and manage modern slavery risks within the construction supply chain.

Business as usual activities

In addition to the targeted activities identified above, for all our major procurement exercises we will assess the likely level of modern slavery risk and perform proportionate due diligence within our supplier appointment processes. Furthermore, we will again monitor good practice on this issue and complete a spend analysis at the end of the financial year.

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

Signed by: Professor Mary Stuart CBE

On behalf of University of Lincoln
Date: 06/11/2020