

## ANTI-SLAVERY TRANSPARENCY STATEMENT

### Introduction

This statement constitutes the University of Lincoln's anti-slavery and human trafficking statement for the financial year ending 31<sup>st</sup> July 2017. 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 2,100 different suppliers each year. The suppliers who we directly purchase from are known as our 1<sup>st</sup> tier suppliers. These 1<sup>st</sup> tier suppliers, in turn, trade with their own supply chains (2<sup>nd</sup> tier, 3<sup>rd</sup> tier and so on) to produce and offer the goods, services and works that the University requires. Our 1<sup>st</sup> 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 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 1<sup>st</sup> 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 year. Typically the overseas suppliers we use operate in high-tech industries in developed countries or are providing 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. In the last financial year, we used a number of 1<sup>st</sup> tier suppliers located in the countries identified by the Walk Free Foundation's Global Slavery Index as having the highest proportion (or highest absolute numbers) of their population in modern slavery. However, these suppliers provided professional services to the University rather than manufactured goods where forced and child labour is more prevalent. Hence, whilst we are not complacent on this issue, we assess our direct impact to be limited.

### **Actions taken in this financial year**

The University's Procurement Team has undertaken various actions this year to help combat modern slavery through our procurement practices. For higher value contracts (above £50k), the issue of modern slavery is now included on a procurement checklist. This ensures that it is considered as part of the decision making process when appointing new suppliers. Alongside this, our selection processes for high value contracts have been updated to include a section assessing suppliers on their compliance with the Modern Slavery Act.

We have undertaken a site visit and audit of the recruitment practices of our contracted supplier of temporary administrative staff. This included reviewing the supplier's processes for registering candidates. The audit gave us confidence there is no possibility of modern slavery occurring within the pool of candidates they provide to the University. However, the audit did identify that the supplier's initially published statement wasn't compliant with the Modern Slavery Act. This has since been rectified following the University drawing their attention to certain omissions in their statement.

The University uses a number of higher education procurement consortia for its procurement requirements. These are buying groups who aggregate the purchasing power of universities to improve value for money and increase our ability to influence suppliers. This year, we have engaged with The University Caterers Organisation (TUCO) who are a consortia specialising in catering supplies. Food supply chains potentially pose a significant risk of modern slavery both in the UK and overseas.

The University purchases the majority of its food supplies through TUCO contracts. Hence, we have made enquiries as to their approach to tackling modern slavery through procurement. TUCO have advised that they undertake a risk assessment for each contract they award and tailor the supplier selection process according to the risk. However, it was also identified that 75% of TUCO suppliers are not required to report under the Modern Slavery Act due to falling below the £36m minimum turnover at which a statement is required. As a result, TUCO are encouraging these suppliers to undertake actions on a voluntary basis in relation to preventing modern slavery.

Given that using procurement to combat modern slavery is still in its infancy, the University has continued to monitor developments in this field. We have conducted a review of anti-modern

slavery statements published by other universities to help identify good practices we may not have previously considered. Additionally, we have kept abreast of emerging practices by reviewing new guidance issued by the Chartered Institute of Procurement & Supply (CIPS). This has helped the University's Procurement Team to continue reviewing where best to focus its efforts on helping to prevent modern slavery.

### **Future plans**

In the next financial year (2017/18), the University intends to take the following actions as part of our initiatives to play a role in combatting modern slavery:

#### Working with NEUPC

The University is changing its lead consortium to North Eastern Universities Purchasing Consortium (NEUPC). The procurement consortia are an important part of our approach to preventing modern slavery as we use their contracts for many commonly purchased items where modern slavery may be present in the supply chain (e.g. office stationery; IT hardware; laboratory consumables etc.). We will meet with NEUPC to understand how they are tackling modern slavery in their procurement processes and to explore how we can work together on this. This will include considering how contract management meetings with suppliers can be used to review the actions that suppliers are taking to prevent modern slavery within their supply chains.

#### Providing information to potential suppliers

The University has a section on its website which provides suppliers with information on its procurement processes. We will update this to make potential suppliers aware that anti-slavery is a matter on which we will assess their approach for relevant contracts. Raising awareness of this issue amongst our supplier community is an important step given that some suppliers will be less familiar with the issues.

#### Ethical behaviour training

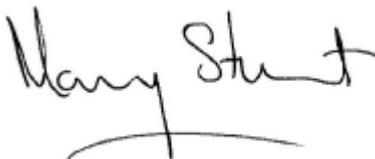
Staff employed in the University's Procurement Team will complete an e-learning course on ethical procurement available through CIPS (who are the UK's leading professional institute for procurement training). This course will provide the team with training on human rights and forced labour within supply chains; the course content has been developed by the Walk Free Foundation, who are specialists in this field.

#### 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

A handwritten signature in black ink that reads "Mary Stuart". The signature is written in a cursive style with a long horizontal stroke at the bottom.

On behalf of University of Lincoln  
Date: 4<sup>th</sup> October 2017