

## MODERN SLAVERY ACT – TRANSPARENCY STATEMENT

### Introduction

This statement constitutes the University of Lincoln's slavery and human trafficking statement for the financial year ending 31<sup>st</sup> July 2016. The University is legally required to publish an annual statement by section 54 of the Modern Slavery Act 2015, this is the first of such a statement.

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 address this issue. It covers both our own workforce and how we will address 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 1,600 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 1,500 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 in the UK, and 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 are from overseas suppliers. Typically the overseas suppliers we use operate in high-tech industries in developed countries where the risk of modern slavery is less prevalent.

Suppliers in less developed countries can pose a greater risk of modern slavery. In the last financial year, we used only a minimal number of 1<sup>st</sup> tier suppliers located in the countries identified by the Walk Free Foundation's 2016 index as having the highest proportion of their population in modern slavery. 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 exposure to be limited.

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

The Modern Slavery Act came into effect part-way through the financial year which this report covers. Our initial actions were to seek to understand the requirements of the legislation and to assess how we can start to take action on this issue.

The University's Procurement Team has considered where best to focus our efforts on addressing modern slavery and external training has been attended to inform this. We have decided that initially our focus will be on 1<sup>st</sup> tier suppliers. This will help to ensure that we concentrate our efforts where we have the most influence over the behaviours and practices of our supply base.

We have also kept ourselves aware of the developments taking place in the higher education procurement consortia. These are buying groups who aggregate the purchasing power of universities to improve value for money and increase our ability to influence suppliers. The consortia are an important part of our approach to 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.). Effectively the University will be delegating its modern slavery supplier due diligence to the consortia for these products. We have seen evidence that the consortia are forming robust plans to tackle modern slavery and are confident that appropriate actions are being taken by them.

### **Future plans**

In the next financial year (2016/17), the University intends to take the following actions as part of our initiatives to play a role in combatting modern slavery:

#### Supplier selection processes

We will undertake checks on how potential suppliers are addressing modern slavery by means of the selection criteria the University uses to assess supplier suitability for high risk/value contracts. The University will make changes to its standard procurement templates so that compliance with the Modern Slavery Act is taken into account as part of the decision making process for such contracts.

### Priority contracts/expenditure

The University has identified the following contracts/areas of external expenditure as warranting a review as to the potential risk of modern slavery:

1. Temporary staffing contract – the University will work with its contracted provider of temporary administrative staff to ensure that their recruitment practices support compliance with the legislation.
2. Facilities management (FM) contracts – the University is due to prepare tender documentation to re-let its FM contracts which include labour intensive services such as cleaning and security. Within the tender process, we will take appropriate steps to ensure that contractors have procedures which are effective in addressing the risk of modern slavery.
3. Food provision contracts – the University uses a number of contracts established by The University Caterers Organisation (TUCO) who are a procurement consortia specialising in catering supplies. The University will engage with TUCO to identify how it is dealing with modern slavery in its contracts and procurement processes.

These areas will be targeted as a result of industry sector risks, rather than the University having concerns with any company that it currently trades with or may do in future.

### Monitoring good practice developments

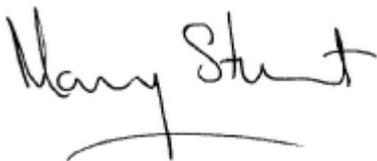
The University will keep up to date with the new practices, tools and techniques that will emerge as organisations respond to the requirements of the Modern Slavery Act. The procurement consortia will be used as a source of information and other professional bodies (e.g. the Chartered Institute of Procurement & Supply) will also be monitored for good practice in tackling modern slavery through procurement. The University will review developments in this respect and will consider any opportunities to improve its practices.

### Spend analysis

We will undertake an analysis of the University's external supplier expenditure at least once a year. This will be used to build a comprehensive picture of what we buy and who we buy it from. The information can then be used to identify any changes in our buying patterns and in the countries we purchase from. This will 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 reviewed 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 horizontal line underneath the name.

On behalf of University of Lincoln

Date: 31<sup>st</sup> October 2016