

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 2023. The University is legally required to publish an annual statement by section 54 of the Modern Slavery Act 2015 (the "Act").

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 address the issue of 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. Our primary activities are the provision of inspirational teaching, undertaking world-leading research and developing links with industry. The University is organised into two academic colleges (the College of Arts, Social Sciences and Humanities and the College of Health and Science) 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 a workforce of circa 2,200 staff (full and part-time) and we have a thorough set of employment related policies and procedures that prevent any possibility of modern slavery occurring within our workforce. Our People, Performance and Culture (PPC) department and recruiting managers are trained and follow a recruitment policy and processes which are regularly reviewed for compliance with legislation.

Interviews take place face to face or online using Microsoft Teams (where candidates are visible to the panel through a video feed). This gives confidence that candidates are seeking employment of their own free will. Right to work information (which involves checking that individuals can legally work in the UK) is then reviewed at offer stage by our PPC team.

These actions combined with the University's commitment to pay the Living Wage means that we can confidently state 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. The expenditure on ICT includes software solutions, hardware, connectivity and other technical services. Estates have requirements including construction works, facilities management, building maintenance and energy. Our other major expenditure categories include laboratory equipment and consumables, library services, catering supplies, externally provided professional services, marketing and travel.

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 provide the goods, services and works that the University requires. Our 1st tier suppliers range from locally based micro businesses through to large global companies. It is not practical to formally map our supply chains due to their range, variety and complexity.

In some cases, the supply chain will be short and clearly visible to us. For example, when we require external professional service providers (such as audit/legal/other consultancy services etc.), typically we can see who is actually doing the work and it is evident that there is no risk of slavery within the direct provision of the service.

By contrast, other expenditure (e.g. construction works, ICT hardware, laboratory equipment, catering supplies etc.) involves complex extended supply chains going down many tiers which are not visible or transparent to us. These supply chains can span multiple countries with multiple tiers from raw material production through to finished products. They are also fluid with regular change occurring as companies move their own supply sources in response to competitive pressures and wider economic forces. The risks of slavery occurring somewhere within one of these extended global supply chains is high.

It is not realistic for the University to directly manage or significantly influence complex multi-tiered supply chains. Instead, we seek to work with our 1st tier suppliers (in higher risk categories) to raise awareness and encourage them to take positive action on managing modern slavery risk further down the supply chain.

Global nature of our suppliers

The majority of our 1st tier suppliers are based in the UK where commercial business activities are not a common source of modern slavery. However, we do make use of suppliers based in a total of 60 different countries. In the 2022/23 financial year, 236 out of the total number of our active 2,667 suppliers used were based overseas. The spend with these suppliers represented 6% of our total supplier expenditure.

Based on value, the majority of our overseas supplier expenditure relates to international student recruitment and activities with research/educational partners. However, the last financial year also saw increased overseas expenditure in other spend areas including research-related scientific instrumentation, robotics and software. This uplift was linked to the University having secured additional external research funding.

Slavery risks in all of the expenditure categories where we buy directly from overseas suppliers is relatively low. We are not purchasing the types of price sensitive products from overseas suppliers which are reliant on low-cost sources of labour to compete. Such purchases would pose a more significant slavery risk.

Suppliers based in certain countries are known to 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 prevalence of modern slavery. In the last financial year, the University engaged a total of eight different suppliers located in three of these countries (Turkey, United Arab Emirates and Russia). Our total expenditure in these high risk countries is less than £40k combined. Some of the suppliers we have used in these countries are private individuals delivering consultancy work and there is no slavery risk as a result.

Actions taken in this financial year

A number of actions have been undertaken by the University in the last financial year (2022/23) in regard to anti-slavery, these are as follows:

Analysis of £50k+ supply base

We have conducted an analysis of our more significant UK based suppliers (with whom we are spending more than £50k per annum) to get a better understanding of which suppliers are themselves subject to the reporting requirements of the Modern Slavery Act (i.e. those with an annual turnover of £36m+).

Of the 116 commercial suppliers analysed, we identified that only 36% of these suppliers met the turnover threshold to be subject to the Act themselves. This has helped us to be increasingly aware that even suppliers whom we hold significant contracts with will have differing levels of knowledge and understanding of supply chain slavery risks. We will continue to take an approach that is proportionate and mindful that some of our suppliers can have limited awareness of anti-slavery issues.

Managed print service contract

One of the major tender exercises conducted in the last year was the re-tendering of our managed print service contract. This contract involves leasing a fleet of multi-functional devices to allow staff and students to undertake printing, scanning and photocopying. Manufacturing these devices requires an extended supply chain of components and final assembly. There is a significant risk of slavery being present at some level in the complex supply chains of such devices.

Tenderers were required to respond to a scored question asking them to demonstrate their awareness of supply chain slavery risks and how they would work with the University on this issue. This question was worth 5% of the overall marks available for quality-related factors and the supplier we appointed for this contract scored highest on their response to this question.

Updated Selection Questionnaire

The Selection Questionnaire is a document used in major tender exercises, which are being openly advertised, to assess the potential suitability of suppliers to be considered for a contract. We have updated the anti-slavery question in this template to align with guidance from central government. This question is used a preliminary 'pass/fail' mechanism and is supplemented by weighted qualitative questions where the contract being tendered carries a higher slavery risk.

Refresher training

The central Procurement Team, who lead on tendering the University's major contracts, have undertaken refresher training on combatting anti-slavery in public procurement by completing an online module through the Government Commercial College.

Future plans

In the next financial year (2023/24), the University intends to take the following actions as part of our initiatives to play a role in combatting modern slavery:

Engaging with Electronics Watch

Electronics Watch are a not-for-profit organisation who use local partners to coordinate independent monitoring and remediation to protect the rights of overseas workers in ICT equipment supply chains. The University has become an affiliate member of Electronics Watch and we will engage with them to further enhance our understanding of our supply chain risk for ICT devices and hardware.

By disclosing our commonly purchased ICT equipment to Electronics Watch they can correlate this information with any existing slavery risk records they have from previous monitoring visits and supply chain data. We have already identified, from dialogue with Electronics Watch, that some of the major global ICT hardware manufacturers used by the University are reluctant to engage constructively on slavery risks (being unwilling to disclose information on their factories to enable independent monitoring).

Audio visual equipment contract

The University will be re-tendering its long term contract for audio visual (AV) equipment requirements. This contract involves the purchase of large amounts of hardware as part of updating and refreshing our AV capabilities. The technology required for this contract involves a complex supply chain of manufactured components and there is a significant risk of slavery being present somewhere in the supply chain.

As part of the tender procedure for this contract, we will include appropriate questions for tenderers to explain how they go about addressing this issue and how they would plan to work with the University to manage the potential risks. Wording will also be included in the contract requiring the successful supplier to engage with the University on managing supply chain slavery risks after contract award.

Business as usual activities

In addition to the targeted activities identified above, for all our major procurement exercises we will continue to assess the likely level of modern slavery risk and perform proportionate due diligence within our supplier appointment processes. Office furniture and computer equipment are expected to be on the tender work programme this year and both carry higher potential slavery risks.

Furthermore, we will again monitor emerging good practice on the issue of anti-slavery and continue to take pragmatic steps to improve and develop our procurement approach on this issue. We will again complete a supplier spend analysis at the end of the financial year to identify any significant changes in buying patterns and to our country specific risks.

This statement has been approved by the University's Board of Governors on 26th October 2023 and will be revised annually.

Signed by:

A handwritten signature in black ink that reads "Neal Juster". The signature is written in a cursive style and is underlined with a single horizontal stroke.

Professor Neal Juster, Vice Chancellor
On behalf of University of Lincoln on 13th November 2023