UNIVERSITY OF LINCOLN

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 2025. 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, on 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. This company does not meet the criteria to be subject to the Act in its own right.

Our recruitment practices

We employ a workforce of circa 1,850 core staff and we have a thorough set of employment related policies and procedures that aim to prevent modern slavery occurring within our own 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.

Job 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 the employment offer stage by our PPC team prior to any work being undertaken.

The University also continues to review and track payment of the voluntary real living wage as set by the Living Wage Foundation.

Our supply chains

We have great diversity in the types of purchases we make through our supply chains. Our Digital Technology and Estates departments are responsible for the majority of our high value contracts with suppliers. The expenditure on Digital Technology includes software solutions, IT hardware, connectivity and other related technology services. Estates have requirements including building maintenance, energy, refurbishment works, facilities management and construction related work. Our other major expenditure categories include scientific instruments and laboratory consumables, library services, catering supplies, externally provided professional services, marketing and business 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 be able to provide the goods, services and works that the University requires. Our 1st tier suppliers range from locally based micro businesses through to very 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.), we will usually directly communicate with the individuals who are actually doing the work. It will be evident that there is no risk of slavery within the direct provision of such services.

By contrast, other expenditure (e.g. construction works, ICT hardware, laboratory equipment, catering supplies etc.) involves complex extended supply chains going down many tiers. The multiple tiers of these supply chains are not visible or transparent to us. These supply chains can span multiple countries and involve activities from the extraction of raw materials through to the processing and assembly of finished products.

Supply chains are rarely static and suppliers adjust and reconfigure their own supply sources in response to competitive pressures and wider economic forces (such as tariffs, currency exchange rates etc.). The risks of slavery occurring at some level within one of these extended global supply chains is very high.

It is not realistic for the University to directly manage or significantly influence complex multi-tiered global supply chains. Instead, we 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 also made use of suppliers based in a total of 51 different countries in the 2024/25 financial year. Out of the 2,143 suppliers actively used by the University during this period, 254 of them were based overseas. The spend with these suppliers represented 5.2% of our total supplier expenditure.

Overseas suppliers provide us with a range of services including international student recruitment, software solutions, library-related services and academic support services. We consider slavery risks in these expenditure categories to be relatively low. In the last year, we made very few purchases of physical products, which are more likely to have a higher slavery risk, directly from overseas suppliers.

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 the ten countries which have the highest prevalence of modern slavery. In the last financial year, the University directly engaged with suppliers based in only two of these highest risk countries (Turkey, United Arab Emirates).

Only one supplier we used in these two countries had a significant level of spend (circa £40k). This was with a private individual delivering consultancy work where the University has full confidence there is no risk of slavery. Our spend with eight other suppliers based in these two high risk countries was of a low value and related to international student recruitment or academic support services; both of which we consider to be low risk areas for slavery.

Actions taken in this financial year

A number of actions have been undertaken by the University in the last financial year (2024/25) in regard to anti-slavery, these are as follows:

Procurement Act implementation

The University's procurement activities are subject to public procurement law and a new set of legislation (the Procurement Act 2023) governing this came into effect mid-way through the last financial year. This legislation sets out a series of legal rules and procedures that the University has to follow when awarding and tendering high value contracts.

The new legislation includes certain features which are relevant to addressing slavery risks. There is a new supplier debarment list and strengthened supplier exclusion grounds which can both be used to exclude suppliers that are linked to individuals who have been found guilty of labour market, slavery and/or human trafficking offences. The University has incorporated these new provisions in its procurement processes and updated relevant templates in this regard.

In particular, we have adopted the new Procurement Specific Questionnaire ("PSQ"). The PSQ is a template document used as part of tendering for high value contracts when the opportunity is openly advertised. Its purpose is to gather information on the companies that are tendering and to set a minimum benchmark level of capability (including on anti-slavery) that potential suppliers need to meet before they can be considered as being suitable for the specific contract.

Digital Technology Equipment and Supply tender

We conducted a major tendering exercise this year to amalgamate two of our existing major ICT hardware contracts into one and to also broaden their combined scope. As part of this initiative, we sought to appoint a supplier who demonstrated an understanding of the importance of anti-slavery measures and who could be a responsible partner in this regard. The University would not be engaging directly with the actual manufacturers of hardware devices, instead we were seeking a reseller of ICT hardware.

The complex and extended global supply chains for ICT hardware are known for their prevalence of slavery. Products that will be bought through this contract are at a high risk of slavery occurring somewhere within their supply chain. This can exist at any stage of the supply chain from the mining of rare earth minerals that are essential for the production of technology devices, through to the labour used in product assembly. These activities will typically be taking place in countries where workers are more vulnerable to exploitation.

Some key provisions were included within the procurement process to address the slavery risk that will be present in this contract. Firstly, tenderers needed to respond to a detailed question to describe how they proposed to work with the University on this issue and to manage and mitigate the potential risks outlined above. This was evaluated by the University and the successful tenderer scored full marks on this part of the tender assessment. This gave the University confidence that they had appropriate experience with this issue. Secondly, a number of provisions were included in this contract requiring the appointed supplier to engage meaningfully with the University on anti-slavery measures that are proportionate to this contract.

Future plans

In the coming financial year (2025/26), the University intends to take the following actions as part of our initiatives to play a role in combatting modern slavery:

Revisit high risk expenditure

At the outset of any major procurement exercise, we use a Sourcing Plan to help us identify any key issues that need to be considered during the specific procurement process. Within this, we have identified various types of expenditure where slavery risk within the supply chain is known to be more prevalent. This helps us to make an initial risk assessment and informs the approach to anti-slavery we take during the procurement exercise.

We will take the opportunity to review the latest guidance published by various anti-slavery campaign bodies to update our awareness of where slavery risks are highest and then refresh our internal guidance in this regard.

Networking contract procurement

Our contract for ICT networking services expires next year and we will be working on the procurement of the next contract in the coming year. This contract requires a combination of consultancy and maintenance services which present a lower slavery risk. However, the contract is also used to procure various physical devices (switches, access points etc.) for our network infrastructure. The manufacturing of these devices presents a significant slavery risk within the supply chain.

As part of developing the procurement process for this contract, we will consider including appropriate questions for tenderers to explain how they go about addressing slavery risk for the device supply element and how they would plan to work with the University on this. If appropriate, wording may 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 undertake proportionate due diligence within our supplier appointment processes.

The University's portfolio of procurement projects is split into two groupings: "renewable contracts" and "one-off contracts". Renewables are those contracts for supplies and services that are needed year-after-year. These are typically tendered on a predictable 3 to 5 year cycle before the relevant contract reaches its expiration date.

Most renewable contracts include extension options to add an extra year or two to the initial contract period. Where a contract is being considered for extension and there is a medium-to-high risk of slavery associated with the expenditure, we will undertake appropriate due diligence before extending.

One-off contracts are not repeated and are much less predictable. They can emerge at different times during the year and from a variety of new initiatives and funding sources, with varying degrees of slavery risk. Some one-off contracts are the result of University budgets being allocated, but others result from various forms of external funding being secured.

At the time of writing, the procurement workplan for the year is still under development and the capital projects (one-offs) are still being planned. However, some procurement exercises known to have higher slavery risks are already scheduled. Workwear garments have a high slavery risk and we have a renewable student nursing uniform contract which expires next year. Food production supply chains also present a higher risk of slavery and various catering supplies contracts are also expiring. The procurement strategies for these are yet to be determined. However, appropriate consideration will be given to addressing these risks within any subsequent procurement exercises.

Furthermore, we will continue to monitor good practice on the issue of anti-slavery and 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 our buying patterns and to our country specific risks.

This statement has been approved by the University's Board of Governors on 16th October 2025 and will be revised annually.

Signed by:

Professor Neal Juster, Vice Chancellor
On behalf of University of Lincoln on 20th October 2025