

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 2021. 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 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. 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 offer stage by our HR team. Interviews now take place predominantly online, using Microsoft Teams, due to the Covid-19 pandemic. However, other than by exception (for reasons of a reasonable adjustment), candidates remain visible to the panel through video functionality. This gives confidence that they are seeking employment of their own free will.

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. 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 laboratory equipment and consumables, library materials, catering supplies, externally provided professional services and travel (at least pre-pandemic).

The University purchased from nearly 2,300 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. It is not practical to formally map our supply chains due to their range, variety and complexity. However, we are aware of the underlying dynamics of our supply chains and the relative risk they present in regard to potential occurrences of slavery within them.

At one end of the scale, our external professional service providers (e.g. audit/legal/other consultancy services etc.) have short supply chains. We can be confident that slavery risks here are minimal due to them effectively being a labour only service for which UK based staff, who need to be well qualified (and paid accordingly), are exclusively used in service delivery.

By contrast, other expenditure (construction works, ICT hardware, laboratory equipment etc.) involves complex extended supply chains going down many tiers which are not visible or transparent to us. These supply chains will also be dynamic with changes occurring regularly as manufacturers change their own supply sources in response to competitive pressures and global economic forces.

The risks of slavery occurring somewhere within one of these extended supply chains are much higher. It is not realistic for the University to directly manage or significantly influence such complex multi-tiered supply chains. Instead we seek to work with our 1st tier suppliers (in higher risk categories) to encourage them to take positive action on managing modern slavery risk further down the supply chain.

The vast majority of our 1st tier suppliers are based in the UK where industrial activities are not a common source of modern slavery. Only 3.7% (by value) of the University's purchases in the 2020/21 financial year were from suppliers based overseas. Our overseas supplier expenditure is mainly in relation to student recruitment activities or with research/educational partners. There is also a small amount of bespoke scientific equipment and software solutions purchased from suppliers located overseas. The risk of slavery in these sectors is much lower than in low cost manufacturing sectors which depend on cheap sources of labour to compete in price sensitive industries.

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 located in only one of these ten countries (Pakistan). Our expenditure in Pakistan was for student recruitment and marketing services, which we assess to be at much lower risk of slavery. The University also contracted with these service providers on terms and conditions which address the issue of anti-slavery and sets certain minimum obligations.

Actions taken in this financial year

A number of actions have been undertaken by the University in the last financial year (2020/21) in regard to anti-slavery, these are as follows:

The Bridge – construction project

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 which is being constructed on the Brayford campus. Construction activities involve the potential risk of slavery either within the on-site labour workforce or within the supply chain for the goods and materials needed for construction.

As part of the contractor appointment process, tenderers were assessed on whether they were complying with the reporting obligations of the Modern Slavery Act. All tenderers passed the anti-slavery element of the shortlisting process. Henry Brothers Group were ultimately appointed as the successful contractor for the construction of this building.

After appointing Henry Brothers Group, a further follow up exercise was undertaken to better understand their anti-slavery measures. They provided information on the recruitment practices they have for both their direct and supply chain labour (specialist trades etc.), explained how they work with their subcontractor network on this issue, and noted that they have provided training for senior staff on how to spot the signs of modern slavery. This gave confidence that the appointed contractor was aware of slavery risks in construction and that they would be taking proportionate mitigating actions in regard to the University's project.

IT hardware procurement

The University tendered for two significant IT hardware contracts this year. The first being the supply of PCs, laptops and thin client devices; the second was for the supply of Apple devices. The manufacturing of electronics componentry and the final assembly of IT hardware are known to present risks of slavery within their supply chains.

For the first of these contracts, different hardware manufacturers were competing for the University's business. Hence, an evaluation question on the approach of each tenderer to managing supply chain risks around labour conditions was asked as part of the process of choosing which supplier to appoint.

A different approach was taken for the Apple devices tender as the choice of hardware had already been pre-determined and the tender exercise was to appoint a reseller (who would not be able to significantly influence the supply chain). Instead a review of Apple's own approach to combatting slavery was undertaken.

After separate competitive processes, both tenders were won by the same supplier (XMA Ltd). These are long term contracts and there will be further opportunities to raise the issue of anti-slavery measures during contract management meetings.

New travel contract – hotels review

The hotel sector is one of our spend areas which is at a higher risk of labour exploitation due to the low wage manual labour (i.e. housekeeping, kitchen staff etc.) involved. Hotel staff employed to do this work are potentially vulnerable to exploitative working conditions. However, the University's exposure to this risk in 2020/21 has been negated by travel (and hotel bookings) being heavily curtailed by the pandemic.

We awarded a new contract for a travel management company (Diversity Travel) this year. As part of this process, tenderers were assessed on their anti-slavery practices at an early stage of shortlisting. Even though travel (both domestic and international) is likely to remain well below pre-pandemic levels in the short/medium term, we expect to see an uptick in our need for hotel rooms in the coming year. The University is one step removed from the hotel companies when we book through Diversity Travel. Hence, we need to work with them to address anti-slavery in the highly fragmented hotel market which comprises everything from small independents through to large chain hotels. There is more work to do in this regard,

starting with using our future management information to better understand the profile of our hotel spend and where the risks of exploitative labour practices may be higher.

Spend analysis

We have again undertaken an analysis of the University's external supplier expenditure. This provides a good understanding of what we buy, and who and where we buy it from. This analysis has helped us to develop a clearer understanding of where we are buying from international suppliers and to consider any high risk spend in respect of modern slavery.

Future plans

In the next financial year (2021/22), the University intends to take the following actions as part of our initiatives to play a role in combatting modern slavery:

Contract extensions

The University has a portfolio of longer term contracts with suppliers for the majority of its higher value external expenditure. These contracts will typically include extension options allowing the University to extend contracts where the supplier is performing effectively. As part of the decision making process as to whether to extend a particular contract, we will now review the supplier's stance on anti-slavery and, specifically, whether they have a valid and current anti-slavery statement (if they are legally required to publish one).

TUCO (The University Caterers Organisation)

TUCO are an organisation that set up a range of collaborative procurement arrangements (framework agreements) with catering suppliers. The University is using an increasing amount of TUCO contracts and certain food supply chains (particularly those originating in emerging economies) are known to be at considerable risk of slavery. Hence, we will engage with them on this agenda to assess further how we can best work together on anti-slavery measures across the TUCO supply base.

Student accommodation internet provision

The University is currently reviewing its internet provision within its student accommodation with the possibility of outsourcing the delivery of this service. This service relies on a whole series of networking hardware infrastructure which comes with an associated risk of slavery in the supply chains necessary to manufacture this technology. As part of any tender process (and subsequent contract) we will give consideration to the anti-slavery measures that we can reasonably request of any potential new suppliers we contract with following this review.

Home Office register

We will publish the University's statement on the Home Office's new Modern Slavery Statement Registry. Publication on the registry is currently voluntary, but doing so allows interested parties to easily locate and consider statements from multiple organisations.

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 NEAL JUSTER]*

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.

On behalf of University of Lincoln
Date: 1st November 2021