



University of London Anti-Slavery and Human Trafficking Statement 2015-2016

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by the University of London Procurement Team during 2015-2016 to ensure supply chain transparency in order to manage the risk of modern slavery and human trafficking.

Introduction

Modern slavery encompasses slavery, servitude, forced and compulsory labour and human trafficking. Traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude and inhumane treatment. The scale of modern slavery in the UK is significant; modern slavery crimes are being committed across the country and there have been year on year increases in the number of victims identified. And whilst a large number of active organised crime groups are involved in modern slavery it is also committed by individual opportunistic perpetrators.

The University of London Procurement Team is committed to tackling modern slavery within our procurement, contract management and supply chain management operations. We do this through the development of responsible purchasing policies, carrying out due diligence and risk assessments in purchasing and contract management and creating awareness of modern slavery amongst the procurement and contract management community at the University. We also use our strategic planning processes to identify supply chain risks for future procurement activity, possible changes in legislation and supplier improvement through efficient and effective contract management.

1.0 The University of London & Our Supply Chains

The University of London is one of the oldest, largest and most diverse universities in the UK. Established by Royal Charter in 1836, we are recognised globally as a world leader in higher education. The central University, in addition to its Central Academic Bodies, provides a suite of innovative high-quality academic support and professional services, and manages a valuable property portfolio.

The central University, its trading subsidiaries and Central Academic Bodies provide a suite of innovative high-quality academic support and professional services, and manages a valuable property portfolio. The active trading subsidiaries, all wholly owned by the University are CoSector Limited, Senate House Services Limited and Senate House Services One Limited.

The Procurement Team manage a diverse portfolio of procurement activities, from strategic procurement development to managing the tender process and contract management. We purchase a large range of services, products and works that support both the University's curriculum and our indirect or corporate requirements. Whilst most contracts consist of a one tier structure of client to supplier, some contracts have deeper and broader supply chains, mainly for works or more complex services. Most of our suppliers are based in the UK but we do purchase products and services from international sources.

2.0 Developing Policy & Due Diligence

All suppliers who are seeking to do business with the University of London must agree to our Corporate Social Responsibility Policy. For lower value purchases suppliers do this through a self-certification process

and for higher value contracts suppliers complete and sign a prequalification questionnaire that includes their business position on modern slavery:

- In addition to the University's CSR policy, the University of London Procurement Policy references the Modern Slavery act as part of effective supply chain management. The Team is working on a Responsible Procurement Toolkit that will guidance and information to the University's buyers.
- For lower value contracts suppliers self-certify their business and state that they adhere to the University's CSR policy. In the tendering process suppliers are required to complete a prequalification questionnaire where they state they have not been convicted of an offence under section 2 or section 4 of the Modern Slavery Act 2015.
- In contracts where the relevant market has been identified as vulnerable regarding modern slavery issues, project teams will develop specifications that challenge the supplier on their supply chain management policies and practices.
- The Procurement Team is developing a formal contract management system that evaluates contract performance at implementation, on an ongoing basis and at an annual, strategic level. Each performance review is based upon agreed performance indicators, including evaluation on contract sustainability and supply chain management.
- At all stages of the procurement and contract management process we use our best endeavours to challenge suppliers that do not meet our standards regarding modern slavery. In the supplier selection phase we may remove from competition suppliers that do not agree with the University's policies or who have poor supply chain practices in place. In contract management, contracted suppliers will be required to take the necessary action to improve their service delivery and we will work with them to address any supply chain concerns. If the supplier does not improve the University may terminate the business relationship.

"The University of London Procurement Team is committed to upholding the Modern Slavery Act 2015 within our procurement, contract management and supply chain management operations. We will develop and deliver responsible purchasing policies, carry out due diligence and risk assessments in purchasing and contract management and create awareness of modern slavery amongst the procurement and contract management community at the University."

*The University of London Procurement Policy
September 2016*

3.0 Risk Assessment & Management

A key discipline in procurement is the identification and management of risk. Procurement staff members manage risk at all stages of the procurement and contract management process and take appropriate action to mitigate or remove risk to the University. As procurement professionals we observe the guidance on modern slavery that has been established by the Chartered Institute of Procurement & Supply. However we also go beyond the auditing and compliance approach by improving our understanding of where the risks are greatest and prioritising our activity accordingly.

- We engage with our buyers and contract managers at the University, our suppliers and University senior management and decision makers to learn where supply chain risks may lie.
- Procurement projects all include a risk management process that identifies, assigns ownership and endeavours to manage the areas of procurement and supply chains where there is a risk of modern slavery taking place. This information may lead to detailed supply chain specifications for tenderers or where the risk is too great, it may lead to the project ceasing to develop further.
- We have started using category management principles to identify spend at the University and to plot how we spend in more vulnerable markets.
- Procurement and contract management staff have a responsibility to be alert to the risks in the University's contracts and in our wider supply chains. Buyers and contract managers are expected to

report concerns to the Procurement Director and to their line manager or budget holder. In emergency situations the relevant authorities must be contacted in the first instance. Management and the Procurement Director will work together to act upon these risks.

4.0 Raising Awareness & Collaboration

As the strategic knowledge base for procurement at the University of London, the Team is committed to staying aware of modern slavery developments, legislation and case studies involved in procurement and contract management. Eliminating modern slavery effectively requires improved traceability, increased transparency and collaboration between statutory agencies, civil society organisations and both public and private sector business.

Working together we can make an even bigger difference in upholding human rights:

- The Procurement Team raises awareness amongst the procurement and contract management community and collaborate to share best practice. We do this through providing information on the intranet, a monthly departmental newsletter, a programme of bite sized procurement learning events and more comprehensive procurement and contract management training courses.
- We will work in collaboration with other universities and external bodies such as LUPC, HEFCE, the Home Office and recognised anti-slavery charities to share and develop best practice in supply chain management and the elimination of modern slavery.
- The University's Procurement Director is responsible for supply chain management transparency and anti-slavery initiatives.
- To raise awareness the Procurement Team are developing a procurement training course on Responsible Procurement, including details of the Modern Slavery Act, supply chain management and improving transparency.
- The Procurement Team will undertake a survey of the University's supply chain to find out their awareness and planning regarding modern slavery.

5.0 Strategic Planning

Buyers and contract managers both have a part in increasing transparency to eliminate modern slavery in procurement and supply chains. Plans to eliminate slavery and human trafficking need to be developed on an ongoing basis in order to stay aware of market, product and service vulnerabilities.

- The Procurement Team have developed a 3 Year Procurement Plan to review and plan future procurement activity and identify resource needs. The Plan will be used to identify both sustainable procurement opportunities and supply chain vulnerabilities such as modern slavery.
- Procurement will work to create links between the Modern Slavery Statement, the Responsible Toolkit and the University's other key strategies and policies, wherever relevant.
- Procurement is developing guidance and training on contract management with an emphasis on supply chain management and Responsible Procurement.
- In future the Procurement Team will review the University's existing supply chains, in light of the supplier survey (above) and update procurement KPIs and risk registers to include references to modern slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the University of London's modern slavery and human trafficking statement for the financial year ending 2016.

Approved by the University of London Vice Chancellor and Board of Trustees:

Date: 30 November 2016