



## University of London Anti-Slavery and Human Trafficking Statement 2022-2023

This statement is published pursuant to Section 54 of the Modern Slavery Act 2015 and covers the activities of the University of London and its trading subsidiaries. It sets out the steps taken during the year ending 31 July 2023 to ensure transparency in our supply chain and prevent modern slavery.

### **The University of London Structure, Organisation and Supply Chain**

The University of London offers students around the world life-changing access to education, whoever and wherever they are. With a mission to transform lives through knowledge, it delivers high quality academic programmes to all corners of the globe, bringing benefits to society through its research in the humanities and social sciences, and leveraging intellectual connections through public engagement which transcend geographic, social, and cultural barriers.

The University of London educates more than 40,000 distance learners annually in 190 countries and has over 500,000 alumni across the globe. It pioneered the concept of 'education for all' when it was founded in 1836, and has continued to innovate ever since, consistently reimagining learning, teaching and research to anticipate the needs of the future.

At the heart of the University is collaboration. It is a Federation of 17 London-based Member Institutions of outstanding reputation. Each of the 17 independent Member Institutions operate autonomously and publish their own Anti-Slavery and Human Trafficking Statement. Built on this exceptional knowledge base, the University's distance and flexible learning provision enables access to internationally respected undergraduate and postgraduate qualifications from anywhere in the world, changing the lives and prospects of hundreds of thousands of people.

Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. Modern slavery is a crime and a violation of fundamental human rights. It takes many forms, such as slavery, servitude, forced and compulsory labour, child exploitation and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Modern slavery concerns are part of the golden thread of operations from the most senior decision makers cascading down to the rest of staff throughout an organisation. This golden thread weaves through the organisational structure and wholly owned active trading subsidiaries to support the University [Strategy 2020-2025](#).

The University takes a devolved approach to procurement which allows for low value spend to be procured locally but requires that the Procurement Team is consulted for high value, complex or high-risk contracts or where a grant funder would require a procedure to be followed which aligns with the legal requirements of the EU Directives or the Public Contracting Regulations.

### **Understanding Our Supply Chain**

The University has a diverse breadth of non-pay purchasing activity, which can be influenced by the University's procurement activities. The University recognises that it draws goods and services from across the globe and classifies its

activities into three broad categories: Estates, Property and Facilities Management; Corporate and Academic Services; and IT and Digital Services.

The goods and services the University purchases are further broken down into 23 Higher Education sector standard procurement (ProcHE) Level 1 codes, and 288 Level 2 detailed codes, developed by the Higher Education Procurement Association (HEPA) (part of the British Universities Finance Directors Group (BUFDG), a Professional H E Services Ltd (PHES) association).

In Financial Year 2022/23, the University's total non-pay expenditure was £95.4m.

The top five ProcHE categories in the University in order of non-pay spend 2022/23:

*HEPA Level 1 Codes*

- 01.** Non-influenceable Spend
- 02.** Estates and Buildings
- 03.** Professional & Bought-in Services
- 04.** Computer Supplies and Services
- 05.** Catering Supplies & Services

University contracts mainly consist of a one-tier structure between customer and supplier, with a minority of contracts involving deeper and broader subcontracting of products, works or services that are more complex.

Most of the University suppliers are headquartered in the UK, with a significant percentage of these based in London. However, suppliers often import products and services from international sources, and we recognise that a significant amount of purchased goods are produced and assembled outside of the UK, sometimes in higher risk countries.

### Supply Chain Modern Slavery Risk Profile

The University utilises a resource developed by HEPA to conduct modern slavery risk analysis of the commodities and services the University purchases. This helped in preliminary categorisation of 2022/23 spend as low, medium or high-risk, followed by further investigation to corroborate this profile and prioritise modern slavery risk mitigation.

Modern Slavery Risk	Expenditure	% Grand Total
Low	£ 6.9m	68%
Medium	£ 3.8m	4%
High	£ 26.6m	28%
<b>Grand Total</b>	<b>£ 95.4m</b>	<b>100%</b>

Utilising the HEPA Commodity Risk Analysis tool has identified that over 68% of the University's spend can be determined as low risk.

Of the high risk spend, 96% of the total sum of £26.6m was split between expenditure on Estates & Buildings and Facilities Management (73%) and Recruitment (23%). The University takes concerted efforts to reduce the risk of modern slavery in our estates and facilities operations and within our recruitment practices utilising low risk services from reputable employment agencies.

## Due Diligence and Risk Assessment

The University conducts modern slavery due diligence on its supply chain based on our assessment of the potential risk and the potential value of the contract under consideration, often using the Pareto Principle to direct resources appropriately.

This could include any combination of the following:

- Highlighting potential risks relating to Modern Slavery with suppliers throughout the procurement cycle, for example any industry news, and maintaining dialogue about mitigation, particularly with those who have annual turnovers above the Modern Slavery Act 2015 reporting requirements of £36 million.
- During the procurement process, where applicable, all suppliers must complete questionnaires to state they have not been convicted of an offence under Section 2 or Section 4 of the Modern Slavery Act 2015. Failure to confirm this can result in exclusion.
- As a member of the London Universities Purchasing Consortium the University is automatically affiliated to Electronics Watch: <https://electronicswatch.org/en>. Where applicable framework agreements are used, these will have specialised clauses to increase supply chain transparency and combat Modern Slavery. For example, an IT Framework Agreement requires appointed contractors to perform due diligence to achieve supply chain transparency, collaborate with independent monitors, and remedy breaches of labour rights and safety standards.
- New suppliers to the University must commit to complying with all applicable anti-slavery and human trafficking laws, statutes and regulations including but not limited to the Modern Slavery Act 2015 in order to be accepted as a supplier.
- All major procurement exercises incorporate environmental, social and governance (ESG) factors within the evaluation.

## Investments

The University offers two pension schemes that staff can opt into. These are the Superannuation Arrangements of the University of London (SAUL) and the Universities Superannuation Scheme (USS). Both schemes are signatories of the United Nations Principles for Responsible Investment, to identify any potential risks of modern slavery incorporated in new and ongoing investments.

## Organisational Policies

The University has a diverse range of policies which are overseen at the highest levels of governance to ensure total commitment by the organisation to eradicating modern slavery in its supply chains. All these documents are available for all staff in our internal intranet, and some are available to view on our external website [University Policies](#). The University publishes its [Corporate-Social-Responsibility-Statement](#) annually.

## Public Interest Disclosure Ordinance

The Public Interest Disclosure Ordinance is available for all staff to raise concerns about modern slavery, among other issues, if identified, without fear of victimisation. This Ordinance assists the University in acting upon and, if necessary, investigating a complaint, while also demonstrating the University maintains the highest standards of conduct when interacting with its supply chains.

## The University of London Procurement Policy

The University adopted the ISO20400 as a benchmark for its Responsible Procurement Policy which dictates the overarching procurement rules that must be observed by all staff when purchasing or placing contracts on behalf of the University. Inherent in this is the need for further due diligence on potential suppliers where higher values and risk is involved.

The Procurement Policy also sets out the commercial and ethical considerations regarding modern slavery that must be taken in the purchase of supplies, services and works.

### **Code of Conduct for Recruitment and Labour in the Supply Chain**

This Policy is a statement included with all major tenders, predominantly where it is anticipated that sub-contractors will be used, which seeks to ensure that all suppliers, and subcontractors, working with the University to deliver works, goods and services, actively address and work to eradicate all forms of modern slavery in their supply chains in line with the [Ethical Trading Initiative Base Code](#).

### **Donations**

The Donations Acceptance Policy governs how the University welcomes genuine philanthropic donations, which support the values of the University and enables it to advance its mission, support its strategic plan and enhance its programmes and services.

As part of this, the University has an Ethical Acceptance of Donations Policy, where all potential donations of £10,000 and above automatically require an ethical screening of the donor. This policy mitigates whether there might have been modern slavery present in the activities that generated the asset or money to be given.

### **Measuring Effectiveness and Planning for the Future**

#### **Contract Management**

The University undertakes contract management that evaluates performance at implementation, on an ongoing basis and at an annual, strategic level. Performance reviews use agreed performance indicators, including evaluation on contract sustainability and supply chain management where applicable.

At all stages of the contract management process, the University shall use its best endeavours to challenge suppliers that do not meet standards regarding modern slavery. In the supplier selection phase, the University may remove from competition suppliers that do not agree with the University's policies or who have poor supply chain practices in place.

If performance concerns arise, contracted suppliers will be required to take the necessary action to improve their service delivery and the University will collaborate with them to address any supply chain concerns. If the supplier does not provide evidence of improvement, the University reserves the right to terminate the business relationship.

#### **Risk Assessment and Management**

A key discipline among operational staff is the identification and management of risk. Staff members manage risk at all stages of the contract management cycle by taking appropriate action to mitigate or remove risk to the University. Procurement professionals must observe guidance on modern slavery established by the Chartered Institute of Procurement and Supply (CIPS). This recommends that:

- Staff engage with buyers, contract managers, senior management and decision makers at the University, and our suppliers to learn where supply chain risks may lie.
- Contracts should include a risk management process that identifies, assigns ownership and endeavours to manage the areas of delivery 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.
- Category management principles are used to leverage specialist knowledge in identifying and influencing spend at the University, allowing us to plot how we spend in more vulnerable markets and how to mitigate this.
- Buyers and contract managers are expected to report concerns to the Finance Director and to their line manager or budget holder. In emergencies, the relevant authorities must be contacted in the first instance. Management work together to act upon these risks.

## Research, Training and Capacity Building

As the strategic knowledge base for procurement at the University of London, the Procurement Team maintains awareness of modern slavery legislation, developments, resources and case studies to support the procurement process 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 will contribute to upholding human rights:

- The Procurement Team can contribute to awareness amongst the procurement and contract management community and collaborate to share best practice.
- The Procurement Team work in collaboration with other Higher Education and external bodies such as the London Universities Purchasing Consortium (LUPC), Office for Students, the Home Office and recognised anti-slavery charities to share and develop best practice in supply chain management and the elimination of modern slavery.

## Strategic Planning and Category Management

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

- The Procurement Team align operations with a Contract Register, to review and plan future procurement activity and identify resource needs. The Plan is used to identify both sustainable sourcing opportunities and supply chain vulnerabilities such as modern slavery.
- Procurement continues to create links between departments including Sustainability to ensure Modern Slavery considerations and actions are included in the University's other key strategies and policies, where relevant.
- Procurement provides contract management guidance with an emphasis on supply chain management and Responsible Procurement.
- The Procurement team will continually review the University existing contracts, and update KPIs and contract risk registers to include references to modern slavery.
- The University is an accredited Living Wage Foundation member and reviews suppliers to ensure that suppliers working on the University estate pay directly employed staff the London Living Wage.

## Achievements in 2022 - 2023

The University awarded hundreds of contracts of all values for products, services, and works. Where applicable, all suppliers bidding for these opportunities must agree to observe the Modern Slavery Act 2015 in order to become a supplier to the University. Tender specification and evaluation criteria include modern slavery requirements, where relevant. Where contracts are already established these continue to be reviewed with the relevant suppliers.

The University continues to be a strategic lead contributor to the London Anchors Institutions' Network <https://www.anchors.london/> with a focus on delivering opportunities for London based people, businesses and places. Specifically, the University procurement team sit on the core procurement working group supporting inclusive economic growth by buying a greater share of our goods, services and works from London-based micro, small, medium-sized and/or diverse businesses indirectly reducing the opportunity for modern slavery in the supply chain.

## Plans for the year ahead.

The University will continue to support and promote the Modern Slavery Act and deliver upon the goals set out in this statement.

- Assess University procurement policy against the ISO20400: Responsible Procurement standard. This assessment can provide feedback to identify areas of improvement and provide a benchmark.

- Update the University Procurement Policy to ensure modern slavery and sustainability is embedded in procurement and to ensure all members of staff are aware they must consider the risk of modern slavery in all purchases and develop the contract or purchase appropriately to mitigate any risk.
- Embed the principles of the [United Nations Sustainable Development Goal8](#): “Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all”.
- Publish the Anti-Slavery and Human Trafficking Statement to the Home Office’s Modern Slavery Statement registry.
- If applicable investigate, record and highlight, as precisely as possible, where all goods are assembled and components produced with our current and new suppliers, to highlight risk of modern slavery and act where necessary.
- Provide modern slavery awareness and mitigation training among contract managers where appropriate or necessary.
- Continue to promote the goals of the London Anchors Institutions Network and use the expertise and resources at its disposal to support its civic agenda.
- Continued accreditation as a Living Wage employer. There is evidence that ensuring a living wage for workers at every stage of the supply chain lessens the likelihood of them becoming victims of forced labour or child labour.

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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 31 July 2023.

**Approved by:**

**Wendy Thomson, University of London Vice-Chancellor**

**And the University of London Board of Trustees**

**Date: 22 November 2023**