

Modern slavery and human trafficking statement 2024-25

Introduction from the Chief Financial Officer

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour 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.

We are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st July 2025.

Organisational structure

We are a leading UK university in the higher education sector, committed to delivering world changing research and high quality, inspirational teaching. We have approximately 23,300 students and 4,300 staff. In 2024-25, we had an income of £396m and an expenditure of £402m (including capital expenditure).

We are governed by Council and Senate. We are managed by the Executive Board, chaired by the President and Vice-Chancellor.

Academic disciplines are organised into four Colleges:

- Science and Engineering
- Life Sciences
- Social Sciences, Arts and Humanities
- Business

Each College is divided into a number of schools and is led by a Pro-Vice-Chancellor & Head of College, who sits on the Executive Board. These Pro-Vice-Chancellors, as well as those responsible for Education and Research & Enterprise, report to the Provost and Deputy Vice-Chancellor.

Our Professional Services, located in the schools, Colleges and Corporate Services, work in partnership with academics to support the academic mission of the University. They report to the Deputy Vice Chancellor (Professional Services), except for Finance (including Procurement) and Estates & Campus Services that report to the Chief Financial Officer.

Our supply chains

We categorise our procurement spend as follows: (% split based on 2024-25 spend profile, where total procurement spend was £127m)

Estates/Construction	33.5%	Travel & Accommodation	2.9%	Furniture	1.0%
Professional Services	24.9%	Catering	1.8%	Audio Visual	0.5%
IT & Telecommunications	18.6%	Library	1.4%	Postal Services	0.5%
Laboratory & Medical	13.5%	Domestic/Cleaning	1.1%	Office Supplies	0.2%

We have undertaken a high-level risk assessment of our contracts, identifying where supply chains extend into sectors and territories that are high risk in terms of the potential presence of modern slavery. The high-risk sub-categories identified are estates-construction, IT-hardware, catering supplies and services, specialist cleaning services, taxis, laboratory supplies (gloves), and personal protective equipment (PPE)/workwear/sports kit/promotional items.

Our policies on slavery and human trafficking

Our workplace policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships. We are committed to ensuring that there is no modern slavery in our supply chains or in any part of our business. Our HR policies and procedures reflect UK employment law.

Our <u>Whistleblowing Policy</u> provides guidance to staff, students, members of its Council and other members of the University on the procedure for the disclosure of information which, in that person's reasonable belief, is in the public interest and tends to show one or more types of malpractice, impropriety or dangers as specified in the Policy.

Our Treasury Management Policy includes a commitment to make investments in an ethically responsible manner.

Due diligence processes for slavery and human trafficking

As well as being reflected in our policies and procedures, the requirements of the Modern Slavery Act 2015 are built into our working documents. The risk of modern slavery within the supply chain is flagged and mitigated within the sourcing strategy checklist/template, pre-qualification/tender documents and our standard terms and conditions.

Our standard tender documents include modern slavery questions enquiring as to bidders' supply chain risk mapping, contract workforce protections (including comprehensive induction covering workplace rights), evidence of modern slavery auditing, follow-up and collaborative action with NGOs, trade unions and other businesses. Our library of tender questions, to be used where appropriate, covers bidders' use of recruitment agencies and recruitment fee breakdowns, including confirmation and evidence that the employer pays these fees (including repatriation costs).

As a founding member of <u>Electronics Watch</u> we are able to build EW labour standards clauses into our contracts for IT hardware, and receive compliance reports from EW monitoring organisations on factories which manufacture products ultimately supplied to the University.

Our pre-qualification/tender documents for Estates procurement signpost the training and resources available from StrongerTogether to help with identifying, and responding to, signs of modern slavery.

For appropriate high value (£100k+) contracts, we employ Social Value Portal (SVP) to gain quantifiable social value commitments from tenderers, to which the successful tenderer is then held, where they are required to regularly record and evidence the social value actually delivered throughout the contract period, within the portal, which SVP then validates for the University. Two of the commitments within SVP which tenderers can select, are:

Commitment/Measure	Proxy	Units
Survivors of modern slavery recruited	£51,561	No. people FTE
Support to mitigate modern slavery risks in supply chain	£1	£ invested incl. time, materials, equipment etc.

Our contract summary template, which is completed by the Procurement Unit/category managers once a contract is awarded, focusing contract managers on the key contract deliverables, performance measures and risks etc., includes a modern slavery risk rating.

We continue to engage with other universities and higher education purchasing consortia, not least the North Eastern Universities Purchasing Consortium (NEUPC) of which we are a member, to agree how best our combined resource may be used to identify and review/monitor risks of modern slavery in our supply chains.

Supplier adherence to our values

We have zero tolerance to modern slavery. As well as taking mitigating measures through the procurement/contract management process (including adding appropriate pre-qualification/tender questions and standard contract clauses), we have expressed this policy, explained the Modern Slavery Act and the related measures we have added to our processes, at local supplier events.

Training

The Procurement Unit has received modern slavery training from NetPositive Futures, the University of Greenwich and the Ethical Trading Initiative, and undertaken the Government Commercial College's 'Tackling Modern Slavery in Supply Chain' online training modules. They are also members of the Chartered Institute of Procurement & Supply (CIPS), by examination, where the topic of modern slavery and human trafficking is included throughout the content of its courses, not least the Ethical Procurement & Supply module.

All staff involved in procurement are made aware of the risks and indicators of modern slavery in our supply chains, along with the mitigating measures detailed above, as part of our rolling in-house Procurement training.

Our effectiveness in combating slavery and human trafficking

Over the course of 2024-25, a number of high-risk contracts, in terms of modern slavery and human trafficking, were awarded. The tender exercises for all these contracts interrogated bidders' policies and practices for mitigating the risks, setting a minimum standard for acceptable answers, as well as allocating a weighting for this element of the bids:

- 10% for the Promotional Items & Branded Garments tender exercise
- 7.5% for Cleaning Services
- 5% for Workwear Supply

Whilst the PPE contract was directly awarded by way of a third-party framework agreement, assurance of effective anti-modern slavery and human trafficking policies and practices was provided by the standards set for suppliers to be on the framework agreement, and the extra due diligence applied by one of the University's *It's a Penalty¹* student ambassadors ahead of awarding the contract to Arco. The student ambassador was particularly impressed by Arco's *Access to Remedy* programme in Malaysia which involved an app for workers to anonymously log any workplace issues.

The student ambassador has also audited all of the suppliers on the University's own Minor Works framework agreement, and our Sports Kit supplier (Kukri), given that they also operate in high-risk industries in terms of modern slavery and human trafficking. All of these suppliers provided satisfactory assurance of robust policies and practices, with the student ambassador taking the opportunity to signpost the resources and support available from *It's a Penalty*.

We also gained confirmation from our supplier of solar panels at one of our sports centres, that the panels had not been manufactured in China's Xinjiang region. The region is a primary producer of panels, supplying 50% of the world's polysilicon required for manufacture, but is heavily linked to the alleged exploitation of Uyghur Muslims.

Paul Gowdridge Chief Financial Officer University of Leicester

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14th November 2025

¹ It's a Penalty is a charity established in 2014 to disrupt human trafficking and exploitation