



Modern slavery and human trafficking statement 2021-22

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 2022.

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 21,505 students and 4,100 staff. In 2021-22, we had an income of £345m and an expenditure of £335m (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 three Colleges:

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

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 President and Vice-Chancellor.

Our Professional Services, located in the academic departments, 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).

Our supply chains

We categorise our procurement spend as follows: *(% split based on 2021-22 spend profile, where total procurement spend was £118m)*

| | | | | | |
|-------------------------|-------|------------------------|------|------------------------------|------|
| Estates/Construction | 31.1% | Travel & Accommodation | 9.1% | Catering | 0.9% |
| Professional Services | 22.6% | Furniture | 4.4% | Domestic/Cleaning, incl. PPE | 0.4% |
| IT & Telecommunications | 15.2% | Audio Visual | 2.4% | Postal Services | 0.3% |
| Laboratory & Medical | 11.6% | Library | 2.0% | 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/workwear/sports kit/promotional leisurewear.

Furthermore, our Procurement Unit uses the Government's Modern Slavery Assessment Tool (MSAT) to check the supply chain slavery risk presented by individual contracts, and suggest any associated mitigations, when developing sourcing strategies.

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 [Whistleblowing Policy](#) 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 Procurement Regulations require compliance with the Modern Slavery Act 2015 (see clause 4.1.5. (c))

Our Sustainable Procurement Guidance Note makes explicit reference to the Modern Slavery Act 2015, with modern slavery included within the pre-procurement risk assessment tool. The Guidance Note prompts consideration of the appropriateness of using labour standards (including ILO core conventions) as selection criteria.

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.

We have purchased [NetPositive Futures' Supplier Engagement Tool](#), which means our suppliers can access the tool free of charge to create a Sustainability Action Plan for their business. Where relevant, the tool identifies actions for the supplier to take in order to mitigate the risk of modern slavery within its supply chains. The tool allows us to run reports to see individual supplier's/all registered suppliers' progress against the identified actions within their plan(s). Our template contract award letter encourages suppliers to use the tool, where its use is not to be made contractual due to the significance of slavery (sustainability factors) given the nature of the contract.

As a founding member of [Electronics Watch](#) 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 respond to, signs of modern slavery.

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. The contract summary template, as well as our contract review meeting agenda template, also note the availability of NetPositive action plan progress reports, including the supplier's progress in taking forward any modern slavery mitigation actions.

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.

Alongside his counterpart at De Montfort University, the Director of Procurement has lobbied the Home Office to use the Government's weight and resource to ensure more practical steps are taken to mitigate the risk of slavery and human trafficking in public/HE sector supply chains. In particular, it has been suggested that the Crown Commercial Service could do more in auditing the supply chains that feed its high risk framework agreements, used across the public/HE sector. Both are now members of the Public Procurement Modern Slavery Group, established in February 2021 in response to this lobbying.

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.

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. All staff have been made aware of the free Modern Slavery online training module made available by the British Universities Finance Directors Group (BUFDG).

Our effectiveness in combating slavery and human trafficking

During 2021-22, we have added the following question to our tender templates, beyond those already asked in relation to modern slavery:

What action do you take to mitigate the risk of modern slavery/human trafficking being part of your operations and that of your supply chains, as they would relate to this contract? The University is particularly interested in:

- The supply chain risk mapping that is undertaken in relation to vulnerable groups, type of work and location
- How it is ensured that the contract workforce:
 - Has access to:
 - Independent, democratic trade union representation or other forms of worker representation
 - Grievance mechanisms
 - Modern slavery training
 - Receives a comprehensive induction that covers their workplace rights
- What evidence can be provided of:
 - Modern slavery/human trafficking auditing and investigation, and follow-up activity where risks/issues identified
 - Collaborative action having been taken with NGOs, trade unions and/or other businesses to improve worker welfare

We have also added the following question to our tender questions library, beyond those already included relating to modern slavery, to be used where a particular contract warrants:

To what extent are recruitment agencies and sub-agencies used to take on workers by your organisation and within your supply chains, as they would relate to this contract?

If recruitment sub-agencies are used:

- In what circumstances are they used?
- Can you confirm that they are not used in countries where they are illegal?

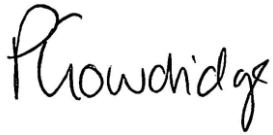
If recruitment agencies/sub-agencies are used to any extent, how confident are you that recruitment fees* are paid by the employer, and not the worker?

Please provide evidence that the employer, rather than the worker, pays the recruitment fees, including:

- A breakdown of typical recruitment costs from two recruitment agencies/sub-agencies from each country, relevant to this contract, showing who pays for what
- Evidence of repatriation costs being paid by the employer, whether the employment contract is terminated at the end of its term or before

**Recruitment fees as defined by the ILO, where they include any and all fees, charges, costs, assessments or other financial obligations associated with the recruiting process regardless of the manner or timing of their imposition or collection, including fees, charges, costs, assessments or other financial obligations assessed against workers in sending, receiving, or transit countries. This can include lodging, transportation from village to interview centre, medical checks and passport costs.*

At the same time, the Procurement Unit has increased its capacity to hold suppliers to account throughout the contract period, including ensuring that they are able to positively answer the above questions on an ongoing basis (not just at the point of tendering).

A handwritten signature in black ink, appearing to read 'P. Gowdridge', written in a cursive style.

Paul Gowdridge

**Chief Financial Officer
University of Leicester**

16th November 2022