Introduction from the Chief Operating 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 2021.

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 20,200 students and 3,700 staff. In 2020-21, we had an income of £318.8m and an expenditure of £305.4m (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 academic 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 Deputy 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. Leadership of the Professional Services is divided between the Chief Operating Officer, Chief Marketing & Engagement Officer and Registrar & Secretary.

Our supply chains

We categorise our procurement spend as follows: (% split based on 2020-21 spend profile, where total procurement spend was £104m)

<table>
<thead>
<tr>
<th>Category</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Estates/Construction</td>
<td>51.8%</td>
</tr>
<tr>
<td>Professional Services</td>
<td>16.4%</td>
</tr>
<tr>
<td>IT &amp; Telecommunications</td>
<td>13.1%</td>
</tr>
<tr>
<td>Laboratory &amp; Medical</td>
<td>10.8%</td>
</tr>
<tr>
<td>Travel &amp; Accommodation</td>
<td>4.3%</td>
</tr>
<tr>
<td>Library</td>
<td>1.5%</td>
</tr>
<tr>
<td>Furniture</td>
<td>0.9%</td>
</tr>
<tr>
<td>Audio Visual</td>
<td>0.5%</td>
</tr>
<tr>
<td>Domestic/Cleaning, incl. PPE</td>
<td>0.3%</td>
</tr>
<tr>
<td>Postal Services</td>
<td>0.2%</td>
</tr>
<tr>
<td>Office Supplies</td>
<td>0.1%</td>
</tr>
<tr>
<td>Catering</td>
<td>0.1%</td>
</tr>
</tbody>
</table>
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.

**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 procurement 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.

Furthermore, 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. 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

All tendering exercises undertaken by the Procurement Unit during 2020-21 incorporated the standard modern slavery risk mitigating measures now built into our procurement process/working documents.

Over the course of the year, the Procurement Unit has sort out and used a number of tools for checking the performance of our suppliers in protecting workers’ rights, including BetterWork for our apparel contracts and Know the Chain for our IT contracts. Our PC and laptop supplier, Hewlett Packard (via DTP), is currently ranked No. 1 in this regard by Know the Chain.

We have also made use of the resources developed as part of Stronger Together’s Construction Programme, adding the following requirement to our Invitation to Tender template for Estates/Construction category contracts:

- To mitigate the risk of modern slavery within its supply chain, the Contractor must:
  - Ensure that the Site Manager (as a minimum) has undertaken training on how to identify and respond to signs of modern slavery among Contractor employees working on the University site; and
  - Clearly display posters about the University site explaining, in all relevant languages, what forced labour is and how to report incidents of it, including via the Modern Slavery Helpline.

StrongerTogether provides resources for fulfilling such requirements- https://www.stronger2gether.org/construction/

Martyn Riddleston
Chief Operating Officer
University of Leicester
6th December 2021