

ANTI-SLAVERY TRANSPARENCY STATEMENT

Introduction

This statement constitutes the University of Lincoln's anti-slavery and human trafficking statement for the financial year ending 31st July 2024. The University is legally required to publish an annual statement by section 54 of the Modern Slavery Act 2015 (the "Act").

Modern slavery is an overarching term to describe all forms of contemporary slavery including human trafficking, slavery, servitude, forced, bonded and child labour. This statement sets out the steps the University has taken, and will take in the coming year, on this issue. It covers both our own workforce and how we will address the prevention of modern slavery in our supply chains.

We have robust recruitment procedures in place to ensure that there is no possibility of slavery in our institution's workforce and we are committed to using our procurement activities to address the issue of modern slavery in our supply chains.

Organisational structure

The University of Lincoln is a Higher Education Corporation and, as an exempt charity, operates on a 'not for profit' basis. Our primary activities are the provision of inspirational teaching, undertaking world-leading research and developing links with industry. The University is organised into two academic colleges (the College of Arts, Social Sciences and Humanities and the College of Health and Science) which are supported by a number of Professional Services (non-academic) departments.

The University also has a subsidiary company (UOL Services Limited) through which a proportion of its non-academic and support staff are employed.

Our recruitment practices

We employ a workforce of circa 1,900 staff (full and part-time) and we have a thorough set of employment related policies and procedures that prevent any possibility of modern slavery occurring within our own workforce. Our People, Performance and Culture (PPC) department and recruiting managers are trained and follow a recruitment policy and processes which are regularly reviewed for compliance with legislation.

Job interviews take place face to face or online using Microsoft Teams (where candidates are visible to the panel through a video feed). This gives confidence that candidates are seeking employment of their own free will. Right to work information (which involves checking that individuals can legally work in the UK) is then reviewed at the employment offer stage by our PPC team.

These actions combined with the University's commitment to pay the Living Wage means that we can confidently state there is no modern slavery in our directly employed workforce.

Our supply chains

We have great diversity in the types of purchases we make through our supply chains. Our Digital Technology and Estates departments are responsible for the majority of our high value contracts with suppliers. The expenditure on Digital Technology includes software solutions, IT hardware, connectivity and other related technology services. Estates have requirements including building maintenance, energy, refurbishment works, facilities management and construction work. Our other major expenditure categories include laboratory equipment and

consumables, library services, catering supplies, externally provided professional services, marketing and business travel.

The suppliers who we directly purchase from are known as our 1st tier suppliers. These 1st tier suppliers, in turn, trade with their own supply chains (at the 2nd tier, 3rd tier and so on) to be able to provide the goods, services and works that the University requires. Our 1st tier suppliers range from locally based micro businesses through to very large global companies. It is not practical to formally map our supply chains due to their range, variety and complexity.

In some cases, the supply chain will be short and clearly visible to us. For example, when we require external professional service providers (such as audit/legal/other consultancy services etc.), we will usually directly communicate with the individuals who are actually doing the work and it will be evident that there is no risk of slavery within the direct provision of such services.

By contrast, other expenditure (e.g. construction works, ICT hardware, laboratory equipment, catering supplies etc.) involves complex extended supply chains going down many tiers which are not visible or transparent to us. These supply chains can span multiple countries with various tiers from raw materials through to the finished products. They are also fluid with regular changes occurring as companies move their own supply sources in response to competitive pressures and wider economic forces. The risks of slavery occurring at some level within one of these extended global supply chains is high.

It is not realistic for the University to directly manage or significantly influence complex multi-tiered supply chains. Instead, we work with our 1st tier suppliers (in higher risk categories) to raise awareness and encourage them to take positive action on managing modern slavery risk further down the supply chain.

Global nature of our suppliers

The majority of our 1st tier suppliers are based in the UK where commercial business activities are not a common source of modern slavery. However, we also made use of suppliers based in a total of 55 different countries in the 2023/24 financial year. Out of 2,447 suppliers actively used during this period, 278 of them were based overseas. Whilst the number of overseas suppliers we used increased this year, the spend with overseas suppliers represented an unchanged 6% of our total supplier expenditure (when compared to the previous financial year).

Overseas suppliers provided us with software solutions, laboratory related equipment and consumables, library-related services and academic support services. However, based on value, the majority of our overseas supplier expenditure is related to international student recruitment. Of our top 10 highest spend overseas suppliers, 8 of these suppliers were engaged to support us with our recruitment of international students.

Slavery risks in the majority of the expenditure categories where we directly engage overseas suppliers is relatively low. We are not purchasing the types of price sensitive products from overseas suppliers which are reliant on low-cost sources of labour to compete. Such purchases would pose a more significant slavery risk.

Suppliers based in certain countries are known to pose a greater risk of modern slavery occurring. The evidence based Global Slavery Index (published by the Walk Free human rights organisation) has identified the ten countries which have the highest prevalence of modern slavery. In the last financial year, the University directly engaged a small number of suppliers located in two of these highest risk countries (Turkey, United Arab Emirates). Only one supplier we used in these two countries had a significant level of spend (circa £50k). This was with a private individual delivering consultancy work where the University has full

confidence there is no risk of slavery. Our spend with the other suppliers based in these two high risk countries was of a low value and related to international student recruitment or academic support services; both of which we consider to be low risk areas for slavery.

Actions taken in this financial year

A number of actions have been undertaken by the University in the last financial year (2023/24) in regard to anti-slavery, these are as follows:

Engagement with Electronics Watch

The University became an affiliate member of Electronics Watch (through our membership of the North Eastern Universities Purchasing Consortium) this year. Electronics Watch are a not-for-profit organisation who use local partners to coordinate independent monitoring and remediation to protect the rights of overseas workers in ICT hardware supply chains. The University has substantial annual spend on ICT products and this is one of our expenditure categories that is at the highest risk of slavery.

One of the key benefits for workers in these supply chains is that Electronics Watch will educate them about their employment rights and then provide an external grievance mechanism and facilitate remediation between workers and their employers. Electronics Watch gives workers, who are at risk of exploitative labour practices, a voice and will advocate for their interests.

The University met with Electronics Watch and provided them with initial information on our more frequently purchased ICT hardware products. The aim of this was to try to better understand the links between our specific purchases and the slavery risks within their supply chains (where these have been previously discovered by Electronics Watch). However, the products we buy change regularly as manufacturers frequently upgrade their technology and the University's needs evolve. Hence, it is difficult to link specifically identified slavery risks to our purchases given the turnover of different products. However, through our engagement with Electronics Watch, we have gained an increased awareness of the systemic prevalence of slavery within these supply chains.

Audio visual equipment contract

The most significant ICT hardware contract we tendered this year was the provision of audio-visual (AV) equipment. This was for a multi-year and high-value contract through which the chosen supplier provides and installs a wide range of AV equipment from different manufacturers across our campuses. There is a significant risk of slavery being present at some level within the complex supply chains of AV hardware.

Most of the suppliers responding to this tender exercise had a turnover below the £36m threshold which would bring their company within scope of needing to report their progress against the Modern Slavery Act. Therefore, a proportionate approach was taken on this issue given the nature of the suppliers who would be tendering for the contract.

We included within the contract an obligation on the successful supplier to work with the University to better understand the slavery risks that may be associated with our AV purchases and to engage with us to provide information on our purchases for potential future disclosure to Electronics Watch. Additionally, the contract included terms and conditions related to anti-slavery measures requiring the supplier to take action in certain circumstances.

Furniture contract

Our contract for office furniture was also competed this year using a North Eastern Universities Purchasing Consortium framework agreement (this is a tender process with a closed group of tenderers). This was a medium risk contract with regard to slavery given there is the potential for risks occurring within the supply chain of materials which are subsequently used in the assembly of furniture products.

Many of the suppliers involved in this process were not subject to the Modern Slavery Act themselves (due to being below the £36m minimum turnover threshold) so a proportionate approach was again taken. This involved inserting clauses related to anti-slavery measures with subcontractors in the terms and conditions for this contract.

Following this procurement exercise, the supplier we used for our previous furniture contract successfully retained the contract renewal. Consequently, we have previously engaged with them on the issue of slavery risk and seen evidence that they are aware of addressing this matter in their business activities.

Selection Questionnaire

The Selection Questionnaire (SQ) is a template document used as part of tendering for high value contracts where the opportunity is openly advertised. Its purpose is to gather information on the companies that are tendering and to set a minimum benchmark level of capability that tenderers need to meet before they can be considered suitable for the specific contract.

We have updated our SQ template to incorporate an improved anti-slavery question based on new guidance published by the Cabinet Office. The revised question is better aligned to the reporting requirements for companies that are in scope of the Modern Slavery Act. The new template is being used in relevant tendering exercises.

Future plans

In the coming financial year (2024/25), the University intends to take the following actions as part of our initiatives to play a role in combatting modern slavery:

Procurement Act implementation

The University's tendering activities are subject to public procurement law and a once in a decade change to this legislation is imminent. The Procurement Act 2023 (the 'Act') will shortly be coming into effect and will replace existing laws in this regard. It sets out legal rules and procedures that the University has to follow when tendering high value contracts.

The new Act includes certain features which are relevant to addressing slavery risks. There is a new supplier debarment list and strengthened exclusion grounds which can both be used to exclude tenderers who have been found guilty of labour market, slavery and human trafficking offences. The University will incorporate the obligations of the new Act in its tendering procedures and update relevant templates in this regard.

Digital Technology Equipment and Supply contract

We have two major contracts for ICT hardware expiring this year and we will be undertaking a significant procurement exercise to replace them. The procurement strategy is still in development, but it is being proposed that these two large contracts are amalgamated into one. Additionally, some of our other smaller spend ICT hardware contracts may also be incorporated within the same procurement. Hence, we will be procuring a very large digital

technology equipment and supply contract for a broad range of ICT hardware. This combined contract will have a value which would place it in the top five of all University supplier contracts.

This digital equipment and supply contract will present a high risk contract in regard to slavery. As previously noted, the complex and extended supply chains for ICT hardware are known for their prevalence of forced labour. As part of the tender procedure for this contract, we will include appropriate questions for tenderers to explain how they go about addressing this issue and how they would plan to work with the University to manage the potential risks. Wording will also be included in the contract requiring the successful supplier to engage with the University on managing supply chain slavery risks after contract award.

Business as usual activities

In addition to the targeted activities identified above, for all our major procurement exercises we will continue to assess the likely level of modern slavery risk and undertake proportionate due diligence within our supplier appointment processes.

The University's portfolio of procurement projects is split into two groupings: "renewable contracts" and "one-off contracts". Renewables are those contracts for supplies and services that are needed year-after-year. These are typically tendered on a predictable 3 to 5 year cycle before the relevant contract reaches its expiration date.

Most renewable contracts include extension options to add an extra year or two to the initial contract period. Where a contract is being considered for extension and there is a medium-to-high risk of slavery associated with the expenditure, we will undertake appropriate due diligence before extending. For example, we have a student nursing uniform contract with a pending extension decision – as workwear garments have a high slavery risk, we will engage our supplier on this matter before considering a contract extension.

One-off contracts are not repeated and are much less predictable. They can emerge at different times during the year and from a variety of new initiatives and funding sources, with varying degrees of slavery risk. Some one-off contracts are the result of University budgets being allocated, but others result from various forms of external funding being secured.

The contracts currently known to be in this year's pipeline which have a higher than average risk of slavery within their slavery chains are renewable contracts for office stationery and grocery, frozen and chilled foods. Appropriate consideration will be given to addressing these risks within any subsequent procurement exercise. Other procurement projects with a medium to high risk of slavery may also come about during the course of the year.

Furthermore, we will continue to monitor emerging good practice on the issue of anti-slavery and take pragmatic steps to improve and develop our procurement approach on this issue. We will again complete a supplier spend analysis at the end of the financial year to identify any significant changes in our buying patterns and to our country specific risks.

This statement has been approved by the University's Board of Governors on 24th October 2024 and will be revised annually.

Signed by:

A handwritten signature in black ink that reads "Neal Juster". The signature is written in a cursive style and is underlined with a single horizontal stroke.

Professor Neal Juster, Vice Chancellor
On behalf of University of Lincoln on 6th November 2024