



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 2022. 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, to tackle 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. Its primary activities are the provision of world class teaching and research. The University is organised into four academic colleges (Colleges of Arts, Science and Social Science and the Lincoln International Business School) 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 core full-time equivalent workforce of circa 2,000 staff and we have a thorough set of employment related policies and procedures that prevent any possibility of modern slavery occurring within our workforce. Our Human Resources (HR) department and recruiting managers are trained and follow a recruitment policy and processes which are regularly reviewed for compliance with legislation.

Interviews take place face to face or online using Microsoft Teams (where candidates are visible to the panel through video functionality). 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 offer stage by our HR 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 ICT and Estates departments are responsible for many of our high value contracts with suppliers. ICT requirements include IT systems, hardware and telecoms; Estates have requirements including construction works, facilities management, building maintenance and energy. Our other major expenditure categories include laboratory equipment and consumables, library materials, catering supplies, externally provided professional services and 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 produce and offer the goods, services and works that the University requires. Our 1st tier suppliers range from locally based micro businesses through to large global companies. It is not practical to formally map our supply chains due to their range, variety and complexity.

At one end of the scale, our external professional service providers (e.g. audit/legal/other consultancy services etc.) have short supply chains. We can be confident that slavery risks here are minimal due to them being a labour only service for which UK based staff, who need to be well qualified (and paid accordingly), are likely to be exclusively used in service delivery.

By contrast, other expenditure (construction works, ICT hardware, laboratory equipment etc.) involves complex extended supply chains going down many tiers which are not visible or transparent to us. These supply chains are also fluid with changes occurring regularly as manufacturers change their own supply sources in response to competitive pressures and global economic forces. The risks of slavery occurring somewhere within one of these extended supply chains are much higher. It is not realistic for the University to directly manage or significantly influence such complex multi-tiered supply chains. Instead, we seek to work with our 1st tier suppliers (in higher risk categories) to 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 industrial activities are not a common source of modern slavery. However, we are seeing a gradual growth in the use of overseas suppliers within our 1st tier supply base. In the 2021/22 financial year, 258 out of the total number of 2,452 suppliers used were based overseas. Whilst this represented 10.5% of our supplier numbers, they accounted for only 4.3% of our total supplier expenditure.

Our overseas supplier expenditure mainly relates to student recruitment activities or is with research/educational partners. There is also a small amount of bespoke scientific equipment and software solutions purchased from suppliers located overseas. The risk of slavery in all these sectors is relatively low. We make almost no purchases of goods directly from low cost countries which depend on cheap sources of labour to compete in price sensitive industries; these would pose a more significant slavery risk.

Suppliers 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 ten countries which have the highest vulnerability to modern slavery. In the last financial year, the University has engaged with suppliers located in two of these ten countries (Pakistan and Iran). The nature of the expenditure in both countries is relatively low risk, relating to international student recruitment agents and an academic project and involving only a handful of transactions.

Actions taken in this financial year

A number of actions have been undertaken by the University in the last financial year (2021/22) in regard to anti-slavery, these are as follows:

Contract extensions

The University has a portfolio of longer term contracts with suppliers for the majority of its higher value recurring external expenditure. These contracts usually include extension options allowing the University to extend the agreement where the supplier is performing effectively.

We have updated our contract extension decision making process to incorporate reviewing if a supplier is subject to the Act and whether they have a valid current anti-slavery statement before extending their contract. Whilst we only have a small sample of extensions in the last 12 months, we have noted that a larger proportion than we expected of our supply base are below the £36m turnover level which would trigger an obligation under the Act for them to prepare a statement.

TUCO (The University Caterers Organisation)

TUCO are an organisation that operate only in the higher education sector and they have established a range of collaborative procurement arrangements (framework agreements) that are made available to their members. The University uses a number of their agreements for purchasing catering supplies such as sandwiches, groceries, chilled and frozen foods etc.

Food supply chains (particularly those which originate in emerging economies) are known to be at considerable risk of slavery. Hence, we have been engaging with TUCO to get a better understanding of how they are addressing anti-slavery in their procurement processes.

TUCO's approach was initially found to be somewhat lacking. We have, therefore, focused on sharing good practice with them and encouraging them to take more a robust approach to anti-slavery in their procurement activities. This is currently a work in progress, but we have since seen positive progress from TUCO with evidence of a more structured and consistent approach being taken.

Student accommodation internet provision

The University completed a major procurement exercise to tender the full outsourcing of its student accommodation internet service provision. This contract required the successful supplier to procure (and install) a substantial quantity of ICT hardware – this is a category of expenditure known to be at higher risk of slavery within the manufacturing supply chain.

As part of the tender process, all tenderers were required to provide a written response to demonstrate an awareness of the issues and explain how they would work with the University on this matter. The appointed supplier received the highest score (when compared to their competitors) on this part of the tender evaluation.

Home Office register

We have started to publish our statements on the Home Office's new Modern Slavery Statement Registry. Publication on the registry is currently voluntary but doing so allows interested parties to easily locate and consider anti-slavery statements from multiple organisations. We will also publish this year's statement on the register.

Spend analysis

We have again undertaken an analysis of the University's external supplier expenditure. This provides a good understanding of what we buy, and who and where we buy it from. This analysis has helped us to develop a clearer understanding of where we are using international suppliers and to consider any high risk spend in respect of modern slavery.

Future plans

In the next financial year (2022/23), the University intends to take the following actions as part of our initiatives to play a role in combatting modern slavery:

Analysis of £50k+ supply base

It would be helpful to have data on the proportion of our larger suppliers that are subject to the Act and who are legally obliged to prepare and publish their own anti-slavery statements. The University has approximately 120 suppliers where we have an annual expenditure of £50k (excluding VAT) or more with them. Hence, we will undertake an analysis of which of these suppliers have an annual turnover of £36m or more (bringing them in scope of the Act).

Managed print service contract

The University is currently reviewing its managed print service with a tender process due to be undertaken this year to replace our existing contract. This service involves the supply of a fleet of multi-functional devices to enable the University to undertake printing, scanning and photocopying. These devices involve a complex supply chain of manufactured components and there is a significant risk of slavery being present somewhere in the supply chain.

As part of the tender procedure, 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 risk.

TUCO follow up

Whilst we have made progress with TUCO, we do need to continue encouraging them to develop a more robust approach in the high risk category of catering supplies. We will consider providing resource for a TUCO tender working party which will enable us to provide constructive input to their tendering procedures. TUCO are an important partner in regard to how we buy catering supplies and choose our suppliers in this area. Therefore, we will continue to engage with them and exchange ideas how we can jointly address anti-slavery.

Refresher training

The central Procurement Team, who lead on tendering major contracts, will undertake refresher training on combatting anti-slavery in a public procurement environment by completing an online module available through the Government Commercial College. This training has a particular focus on how to monitor and assess supply chains for labour rights issues using protective personal equipment (PPE) as a case study.

Business as usual activities

In addition to the targeted activities identified above, for all our major procurement exercises we will assess the likely level of modern slavery risk and perform proportionate due diligence within our supplier appointment processes. Furthermore, we will again monitor good practice on this issue and complete a spend analysis at the end of the financial year.

This statement has been approved by the University's Board of Governors on 20th October 2022 and will be revised annually.

Signed by:



Professor Neal Juster, Vice Chancellor
On behalf of University of Lincoln on 25th October 2022