



# London Universities Purchasing Consortium Slavery and Human Trafficking Statement

Year Eight: A Review of August 2021 to July 2022

## INTRODUCTION

London Universities Purchasing Consortium (LUPC) is a non-profit organisation whose purpose is to achieve value for money for our members in their procurement of goods and services, in a way that benefits our members, society and the economy, whilst minimising damage to human rights and the environment.

LUPC remains committed to supporting international human rights standards, the [UN Guiding Principles on Business and Human Rights](#) (UNGPs) and the [UK Government's National Action Plan](#) to implement the UNGPs.

This statement is designed to satisfy the requirements of Section 54 of the [Modern Slavery Act 2015 \(MSA\)](#), by informing members, staff, and public stakeholders about LUPC and its policy to prevent and address modern slavery, human trafficking, forced and bonded labour and human and labour rights violations in its supply chains, and the steps taken to identify, prevent and mitigate such risks.

LUPC turnover is below the threshold for businesses required to publish a statement. However, LUPC's Board considers that total spend, circa £230m this year, through its supply agreements warrants a statement on the risks inherent in its supply chains and the responsible steps LUPC is taking to address them. It is also consistent with our commitment to increase responsible business practices in procurement.

## LUPC STRUCTURE, BUSINESS AND SUPPLY CHAIN

### Business and Supply Chain

LUPC's supply chain falls mainly under six categories based on the purchasing frameworks agreements it produces and supports. These are:

<b>Laboratory Consumables and Equipment</b> <ul style="list-style-type: none"><li>• Consumables and chemicals</li><li>• Laser equipment</li><li>• Personal protection equipment and clothing</li><li>• Laboratory gases and equipment (supply and installation)</li></ul>	<b>Library Resources</b> <ul style="list-style-type: none"><li>• Books</li><li>• E-books and equipment</li><li>• Software and</li><li>• Maintenance</li></ul>	<b>Professional Services</b> <ul style="list-style-type: none"><li>• Ceremonial gowns and photography services</li><li>• Financial services</li><li>• Insurance Services</li><li>• Debt recovery services</li><li>• Legal services</li></ul>
<b>Estates Goods and Services</b> <ul style="list-style-type: none"><li>• Catering services</li><li>• Security services</li><li>• Cleaning services</li><li>• Waste management services</li><li>• Furniture and furnishing</li></ul>	<b>ICT Equipment and Services</b> <ul style="list-style-type: none"><li>• Audio visual</li><li>• Desktops and notebooks</li><li>• Software and network equipment</li></ul>	<b>Office Supplies and Equipment</b> <ul style="list-style-type: none"><li>• Office, computer and library</li><li>• Paper</li><li>• Print solutions</li><li>• Promotional merchandise</li></ul>



LUPC has over 200 members across universities and colleges of higher and further education and other not-for-profit organisations in the education, arts, science, charity, and wider public sectors. They have access to framework agreements, open to LUPC members, for goods and services across the category areas specified.

LUPC contracts with and therefore directly engages with and has leverage over 130 suppliers. Working alongside other HE consortia nationally, it influences 968 suppliers in total.

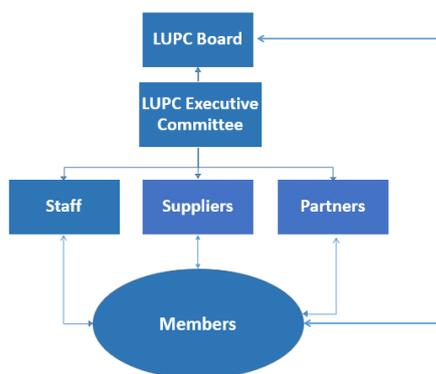
### LUPC Modern Slavery Governance Structure

LUPC's Board of Directors is the ultimate decision-making authority on preventing and addressing modern slavery. Its decisions are acted out and fed into by the Executive Committee, staff, suppliers, members and partners.

LUPC has a dedicated Responsible Procurement Lead, which role is to help implement policies, develop strategies and carry out tasks and actions around responsible procurement with members, suppliers, partners and within LUPC. LUPC also has the resource of a sponsored PhD student for two days a week, to deliver additional Responsible Procurement support.

LUPC partners include:

- [The Business, Human Rights and Environment Research Group \(BHRE\)](#), University of Greenwich;
- [Electronics Watch](#);
- [International Learning Lab on Public Procurement and Human Rights](#);
- [Higher Education Procurement Association \(HEPA\)](#);
- [UK Universities Purchasing Consortia](#);



## GOVERNANCE AND POLICIES

### LUPC Policies and Commitments

The [Strategy 2021-2024](#) 'Working together to achieve shared goals in a changing world' detailed how LUPC will continue to enhance its position as a leader in responsible procurement by implementing effective supplier due diligence, investigate opportunities for collaboration, provide 1:1 support to members, and support members in their efforts for supply chain transparency.

In June 2022, LUPC published a new [Responsible Procurement Strategic Plan](#) that is at the forefront of LUPC business operations. The Strategic Plan was developed in consultation with the Board, Executive Committee, and Heads of Procurement from our membership.

LUPC's Whistleblowing Policy and Procedure allows and encourages staff to use internal mechanisms for reporting any malpractice or illegal act or omission including abuses of human rights, including modern slavery and human trafficking.



LUPC adheres to the [Sustain Supply Chain Code of Conduct](#), which was developed by a working group including sustainability and procurement professionals, student representatives and NGOs. In 2020, the HEPA Responsible Procurement Group endorsed it as the recommended UK HE sector standard supply chain code of conduct. It demonstrates LUPC’s commitment to carrying out procurement activities in an environmentally, socially, ethically and economically responsible manner. To demonstrate this commitment, all new suppliers are asked to commit to responsible procurement within their organisations and to acknowledge their compliance with the principles of the Code of Conduct.

LUPC has been awarded the [Chartered Institute of Procurement & Supply \(CIPS\) Corporate Ethics Mark for the third year](#) in a row. The accreditation demonstrates that LUPC has adopted and embedded ethical values in the way in which we source and manage suppliers.

[LUPC signed up to the SDG \(Sustainable Development Goals\) Accord](#), the University and college sector’s response to the Goals. The purpose of the Accord is to inspire, celebrate and advance the critical role that education has in delivering the SDGs and the value it brings to Governments, businesses and wider society; and is a commitment learning institutions are making to one another to do more to deliver the goals.

## DUE DILIGENCE

### Assessing the Risks Associated with Categories

One of the criteria that LUPC uses to assess risks associated with the product and services in the above categories is their origin. LUPC has identified most of the production countries for its goods and the location of suppliers for its services. It has done this based on its own research on products and production methods, including working conditions and supply chain structures, and its continuing engagement with partners and suppliers, as part of its due diligence process.

LUPC had identified the following source countries as part of its supply chain mapping activity:

Category	Country
<i>Laboratory consumables, including gloves</i>	Malaysia, Indonesia, India, Pakistan
<i>ICT equipment</i>	China, India, Mexico, Taiwan, Brazil, Poland, Czech Republic, Malaysia, USA, Ireland, Philippines, Japan, Vietnam, Thailand, South Korea*
<i>FairPhone</i>	China, Japan, Korea, Taiwan, USA, Peru, Rwanda, Democratic Republic of Congo, Austria, Switzerland, Germany, Netherlands, Malaysia, South Korea *
<i>Cleaning, security, catering services</i>	UK**
<i>Photography Services</i>	UK**
<i>Graduation gowns</i>	UK**, China
<i>Office, computer and library supplies</i>	Austria, Australia, Belgium, Brazil, Bulgaria, China, Estonia, Denmark, Finland, El Salvador, Czech Republic, France, Germany, Greece, Hong Kong, India, Ireland, Italy, Malaysia, Poland, Portugal, Spain, Netherlands, South Korea, Republic of Korea, UK, US, Japan, Serbia, Sweden, Turkey, Norway
<i>Furniture</i>	UK, Poland, Republic of Ireland

*\*Due to the complexity of the ICT equipment supply chain this list of countries is not definitive and there are likely to be other countries where the ICT equipment is manufactured, assembled and where materials are sourced from.*

*\*\* LUPC is aware that goods and services produced or delivered within the UK may also put workers at risk of modern slavery and human trafficking.*

To better understand supply chains and identify potential risks, LUPC has begun mapping its supply chain aiming to go beyond tier 1 suppliers.



## REPORTING ON GOALS FOR 2021-2022

As part of its human rights due diligence, LUPC has taken steps in specific sectors, increased the resources devoted to responsible procurement and developed several tools and collaborations, as described in this section. This year, LUPC continued to work on the projects set out in its Responsible Procurement Policy and Strategy.

### **1. Continue to undertake appropriate evaluation of suppliers using the Supply Chain Evaluation tool.**

A key element of LUPC's due diligence process is the assessment and engagement of suppliers. In order to formalise this engagement, LUPC requires suppliers to sign up to the Sustain Code of Conduct as part of the tender process, something all suppliers are now required to do, as mentioned above.

In 2022, in-house responsible procurement experts developed a new tool to assess the social and environmental performance of suppliers. This is the Supplier Due Diligence Tool (SDDT). Moving forwards, LUPC will require all suppliers to complete the SDDT, as part of their commitment to the Sustain Code.

When completing the SDDT, suppliers answer questions about their organisation and their practices. The main topics covered are:

- Social value, which should encompass all the sustainability aspects: social, environmental and economic;
- Equality, diversity and inclusion;
- Wages;
- Human and labour rights risks in global supply chains;
- Environmental impacts and targets

Overall, the SDDT questions represent a first screening of LUPC suppliers, and have been specifically designed to highlight areas that need to be explored further. By reviewing the responses provided, LUPC can get a general idea of the suppliers' awareness and understanding of specific topics, so it can decide whether they need any support and encouragement moving forwards.

Supplier responses are assessed and scored on a Red-Amber-Green (RAG) scale. The scores are meant to visualise the suppliers' journey towards best practice and do not translate as pass or fail. Suggested improvements and guidance are issued to suppliers by LUPC and periodically reviewed for improvement by both parties.

LUPC decided to start the rolling out of the SDDT with the [Estates and Facilities Management Services \(maintenance and minor works, security: guarding & reception and cleaning\)](#) framework agreement and will evaluate suppliers on the General Laboratory Framework next. All 21 suppliers on the agreement were invited to complete the SDDT in May 2022. We requested suppliers to complete the questionnaire within four weeks from the day of the invitation, but since this was the first time doing this activity, we moved the completion date until July. We followed up with suppliers to provide guidance and extend the deadline further if required.

Out of the 21 suppliers we invited, 18 completed the SDDT. Overall, we found that suppliers were the most advanced in environmental matters.

Since some suppliers only provided us with general statements about their supply chains and related human and labour rights risks, we decided to explore this area further through a deep dive into their modern slavery practices. To do so, we have asked our suppliers to complete the UK [Government Modern Slavery Assessment Tool](#) (MSAT). This is a new risk identification and management tool, provided for free



by the Government, that aims to help public buyers when engaging with suppliers to address exploitation in their supply chains. We will report on the MSAT results in our next statement.

## **2. In collaboration with relevant stakeholders, undertake appropriate supply chain mapping activity for personal protective equipment (PPE) focusing on one product at a time.**

To assess the human rights risks involved in its supply chains, LUPC aimed to understand the origin and production and delivery methods of the products and services its members procure through its agreements. The first step was to identify and then map the supply chain of products and services in specific risk categories. This process involved desk research, and engagement with members, suppliers and external organisations.

Since we do not manage the PPE framework agreement and do not have direct engagement with those suppliers, we have reassessed this goal and decided to focus our efforts on mapping our framework suppliers instead. This will be carried out through our SDDT and the Government's MSAT.

Since 2022, all LUPC tenders require suppliers to commit to completing the SDDT once they are awarded a place in the framework agreement. We will be rolling out the SDDT to suppliers on the Laboratory Equipment (General) and Associated Post Installation Services, and the Graduation and Ceremonial Gown, Photography and Event Services framework agreements, in the next financial year.

## **3. External collaboration**

LUPC collaborates externally with multiple partners to deliver guidance, policies and strategies that will help in raising awareness, understanding, and combating modern slavery.

LUPC's Director, Don Bowman and LUPC Board member, Professor Olga Martin-Ortega contributed their expertise as consultant authors for new guidance developed by the Organization of Security and Co-operation in Europe (OSCE). The guidance, *Combatting Trafficking in Human Beings and Labour Exploitation in Supply Chains*, aims to support procurement and anti-trafficking staff in the OSCE to implement measures to combat labour exploitation in supply chains and has now been published by OSCE.

Don and Olga spent time engaging with the OSCE teams during the project and enjoyed working with such a prestigious international organisation and supporting them in this vital work.

As part of the UK Universities Purchasing Consortia (UKUPC) partnership, LUPC helped develop a comprehensive [guide](#) listing resources related to modern slavery and human rights, which includes guidance on complying with UK and international legislation.

LUPC also partnered with Electronics Watch to highlight the work they do and the benefits to LUPC members as affiliates. During November 2021, LUPC ran a one-week communications campaign where it explained who Electronics Watch are, what they do, and the benefits of affiliation with them.

The BHRE and LUPC updated the [guidance on preparing a modern slavery statement](#), aiming to support higher education and wider public sector organisations in developing human rights due diligence in their supply chain and reporting on what they are doing in their statements.

## **4. Student engagement and research on modern slavery**

Since January 2021, LUPC Responsible Procurement Lead Marisol Bernal has been working in close contact with Martina Trusgnach, who is undertaking a PhD in the Business, Human Rights and Environment (BHRE) Research Group at the University of Greenwich. LUPC sponsors 50% of Martina's PhD and will continue to do so until completion.



In 2021-2022, Martina has refined her research to focus on the relationship between public procurement and the right to effective remedy for human and labour rights violations in global supply chains. This focus has led her to collaborate with Electronics Watch, who are currently developing a framework for worker-driven remedy. In October 2022, together with the Danish Institute for Human Rights and Electronics Watch, she will co-host an in-person training and workshop for public buyers on Access to Remedy and Remediation for Human Rights Abuses in Public Procurement, to which Marisol will also participate. In November 2022, Martina will travel to Malaysia as part of her work with Electronics Watch.

With LUPC, Martina has been working on tenders and supplier evaluation. She helped design the questions on responsible public procurement for the ceremonial gowns framework and has evaluated tenders including legal services and Estates and facilities management services. Together with her supervisor, Prof. Martin-Ortega, and Marisol, she developed a guidance for the public sector on how to write modern slavery statements. Lastly, she was also involved in the development of LUPC's new Supplier Due Diligence Tool (SDDT), which aims to provide an initial screening of suppliers' practices in terms of social value, human rights and environmental impact. This tool has been already rolled out to the Estates and facilities framework, and Martina also helped to evaluate the answers provided by suppliers.

In the next year, Martina will continue to provide support with the frameworks, as well as evaluate suppliers' practices using the SDDT as well as other tools as appropriate.

## **5. Modern slavery work undertaken with LUPC members**

The Responsible Procurement Lead carried out work placements with four of LUPC's members, JISC, Historic Royal Palaces (HRP) and Zoological Society of London (ZSL), and Birkbeck College, University of London.

At JISC, Marisol worked on increasing knowledge of the benefits of Electronics Watch by supporting Jisc with their understanding of their affiliation and helping them to get the most from this; contributed to their Corporate Social Responsibility and Modern Slavery working groups; improved understanding of how the procurement and sustainability functions can work in practice and supported the development of the relationship between the two; and shared relevant modern slavery and sustainability resources with their teams.

At HRP and ZSL Marisol worked alongside the procurement and sustainability teams, where she reviewed and provided feedback on their modern slavery statements; reviewed HRP's current sustainability position in different parts of the organisation; increased the knowledge of their Electronics Watch affiliation; and supported ZSL with their ISO20400 self-assessment.

During the placement at Birkbeck College, Marisol explained and guided the implementation of Electronics Watch tools; reviewed their modern slavery statement and work on their objectives; and supported their modern slavery group and their modern slavery due diligence activity.

Working with our members in this way enables LUPC to raise awareness of human rights issues in an appropriate and proportionate way. This activity in turn, enables our members to share their knowledge throughout their business and supply chain increasing impact and awareness of risks and opportunities widely.

## **6. Commitment to Living Wages: Membership of the Living Wage Foundation**

LUPC has been a member of the London Living Wage Foundation since 2016. It will renew its membership and continue to check annually that anyone employed directly or indirectly with LUPC will always receive the London living wage.

LUPC has also developed [a paper](#) which explores the different wage options in the United Kingdom and considerations that should be made when procuring goods and services, from a wage rate perspective. The



paper sets out some questions you can ask regarding a supplier's stance on paying the living wage and other practical considerations to help you in your procurement activities.

### **7. Independent review under the international standard ISO 20400:2017**

The ISO 20400:2017 is the international standard for sustainable procurement and determines the framework and approach to the procurement of goods and services that contribute to sustainable development, taking into account impacts to the environment, society, ethics and economics.

LUPC is committed to be independently audited under the international standard every two years. Its last audit was finalised in March 2019, and the next audit is scheduled for late 2022.

The evaluation process required for ISO 20400 provides a framework for best practice and structure to our responsible procurement activity, and we are using it as a continuous improvement tool and measure for our work in this area.

### **8. Investigate claims of human rights abuses**

To date, LUPC has received no direct complaints of human rights abuses; however, that does not mean that there are no risks in our supply chains. Therefore, we will take a proactive approach with our suppliers to investigate human rights abuses in high-risk industries.

LUPC will use its SDDT and the Government MSAT to obtain supply chain information and to identify human rights and workers' issues and will work alongside suppliers to advise, communicate and act as required.

### **Electronics Watch affiliation**

LUPC has continued to be an affiliate of and work closely with the NGO [Electronics Watch](#), the collaborative organisation monitoring global electronics supply chains. LUPC joined as a founder member of Electronics Watch back in April 2014 and four years later, our Board approved affiliation on behalf of all full LUPC members.

LUPC has promoted the work of Electronics Watch among its members, helping them to understand and use its different resources, as well as improving direct communication between Electronics Watch and members. It will continue to do so in the next financial year.

#### **LUPC work with Electronics Watch 2021-2022**

LUPC extended its close collaboration with Electronics Watch in order to further improve due diligence and effectiveness in protecting and improving the legal and human rights of workers in electronics supply chains and in October was invited by Electronics Watch to present two sessions on its ongoing supplier and member engagement work in this area at their *"Supply Chain Transparency and Factory Level Impact – What is the Role of Electronics Watch Affiliates?"* webinar.

LUPC was instrumental in assisting with the collection, analysis and discussion of supplier responses to the Electronics Watch *Gap Analysis* tool to understand gaps between workers' priorities and companies' priorities in China, which established several suggested improvements for suppliers to act upon as part of their in-country manufacturing. LUPC's Senior ICT Category Manager engaged with PC manufacturers on both this and as part of the National Desktop and Notebook Agreement tender run in 2022, factory disclosure information down to tier 2 level.



Electronics Watch launched a monitoring pilot of mining operations linked to global electronics supply chains in early 2021 and since then, they have been working with a monitoring partner on nickel mining in the Philippines, the island of Palawan in the Philippines being a major source of nickel for prominent electric vehicle manufacturers and battery suppliers. A report was subsequently published in May linking the large scale mining of nickel to severe human rights and environmental impacts in the Philippines with an affiliate webinar delivered on the main findings in March.

Electronics Watch also continues to engage with the Responsible Business Alliance (RBA) industry body as part of the agreed Terms of Engagement process, which established a step-by-step process and timeline for engagement on factory cases and created a commitment for RBA to address each issue in Electronics Watch monitoring reports.



## TRAINING AND KNOWLEDGE EXCHANGE

### Responsible Procurement Group

The LUPC and the Southern Universities Purchasing consortium (SUPC) have a joint [Responsible Procurement Group \(RPG\)](#). This brings greater visibility to projects being undertaken throughout our combined membership by widening participation of the groups and strengthen relationships between members. Our focus is to share best practice and help those interested by supporting the development of practical advice and guidance on important and relevant subjects.

Each meeting has a presentation from a member institution, providing an opportunity to learn from those who are making changes. This is followed by discussion from members on appropriate and interesting topics, including modern slavery.

During the past year, the RPG had presentation from the Natural History Museum and Aston University, and each meeting had over 40 attendees.

### LUPC annual Responsible Procurement Event

In November 2021, LUPC delivered its Responsible Procurement event together with SUPC. Over 100 attendees heard presentations from Clyde & Co. on Creating a diverse workforce, The University of Nottingham on their Slavery Free Campus and The Environment Agency (EA) on Carbon Offsetting. Attendees were able to take away some practical tips and actions back to their own organisations.

### Modern slavery public sector

LUPC is part of the Home Office led Working group on tackling modern slavery in public sector supply chains, and we will be working with them in the next year to contribute to improving the understanding of the wider public sector on modern slavery issues.

LUPC is part of the *London Responsible Procurement Network (LRPN)*. The aim of the LRPN is to establish a regional network to share ideas and resources amongst London based public sector organisations with an interest in developing innovative responses to promote and implement Responsible Procurement.

The LRPN covers social value, ethical sourcing, employment and skills, local procurement, diversity & inclusion, and environmental sustainability.



The LRPC is run through a Steering Group represented by a number of London public bodies and is chaired by the Head of the Greater London Authority (GLA) Group Responsible Procurement Team.

### **Modern Slavery E-Learning**

LUPC continues to provide and promote its modern slavery [eLearning on its website](#). Over 400 staff members from different public and private sectors ranging from government to private corporations have completed the training. All LUPC staff have completed the eLearning.

### **LUPC Goals for 2022-2023**

1. Continue to undertake appropriate evaluation of suppliers using questions taken from the Supplier Due Diligence Tool.
2. Ensure modern slavery elements are included in relevant framework agreements. During the next year, the Responsible Procurement Lead will be involved in the tender process of the carbon offsetting validation services, catering outsourced services, debt recovery, occupational health, and waste management services.
3. In collaboration with relevant stakeholders, undertake appropriate supply chain mapping activity.
4. Collaborate externally with multiple partners to deliver guidance, policies and strategies that will help in raising awareness, understanding, and combatting human rights abuses in supply chains, including modern slavery, forced labour and human trafficking.
5. Continue student engagement and research on modern slavery in collaboration with the BHRE, University of Greenwich and their project 'Protecting Human Rights in Global Supply Chains in times of Pandemic and the Role of Procurement'. The PhD candidate will continue working closely with LUPC.
6. Report on activity relating to preventing and addressing modern slavery undertaken with LUPC members during work placements delivered by the Responsible Procurement Lead.
7. Continue to be a member of the London Living Wage Foundation and will check annually that anyone employed directly or indirectly with LUPC will always receive the London living wage.
8. Complete and be reassessed independently under the international standard ISO 20400:2017.
9. Thoroughly investigate any claims of human rights abuses, including modern slavery, forced labour and human trafficking within our suppliers and their supply chain, and react appropriately issuing advice, communication and taking action as required.

To see all previous LUPC statements, visit this [link](#).

This statement has been approved by the LUPC Board on 16/12/2022 and will continue to be reviewed annually.



**Don Bowman MCIPS**  
Director, LUPC

**Date: 16/12/2022**

