



London Universities Purchasing Consortium Slavery and Human Trafficking Statement

Year Seven: A Review of August 2020 to July 2021

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.

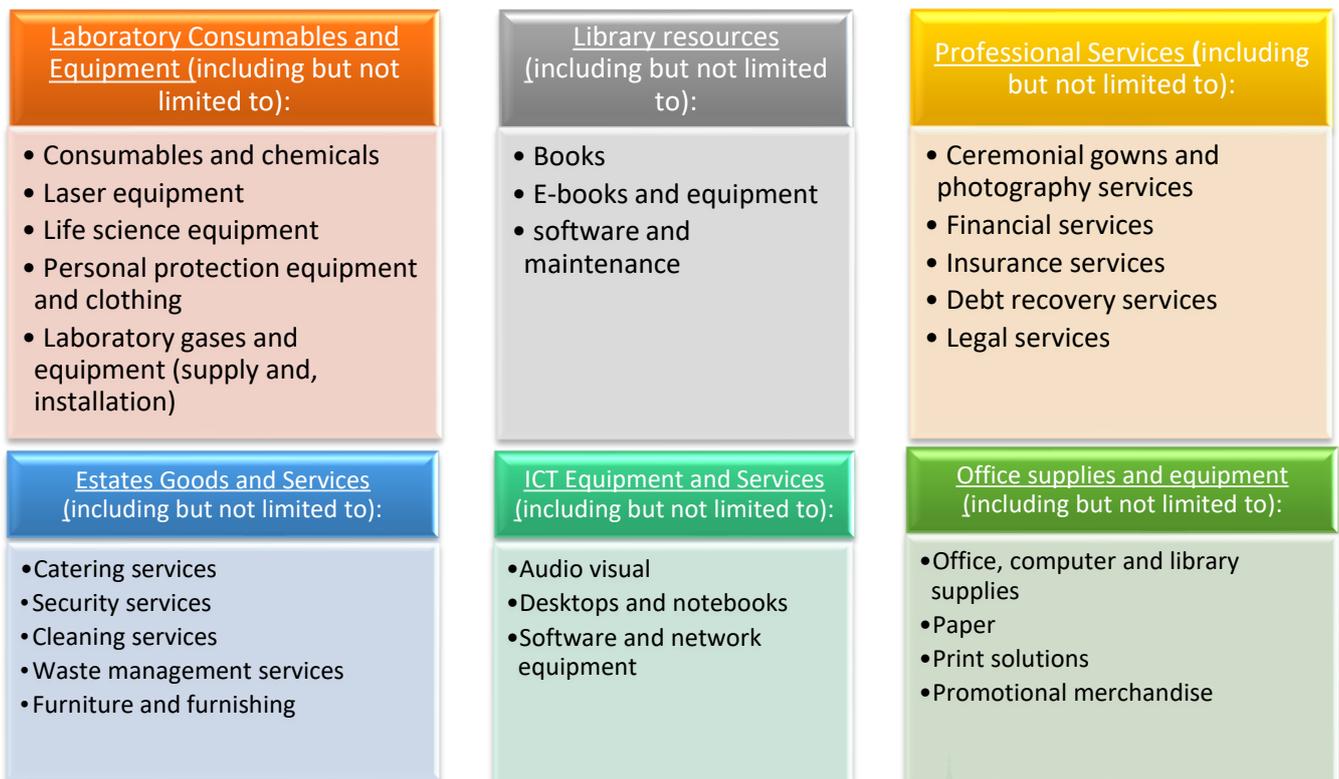
This statement is designed to satisfy the requirements of Section 54 of the [Modern Slavery Act 2015 \(MSA\)](#), by informing members, staff, and public stakeholders about LUPC and its policy to prevent and address modern slavery, human trafficking, forced and bonded labour and labour rights violations 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 £200m 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:



LUPC has over 200 members across universities and colleges of higher and further education, as well as 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 260 suppliers. Working alongside other HE consortia nationally, it has influence over 1373 suppliers in total.

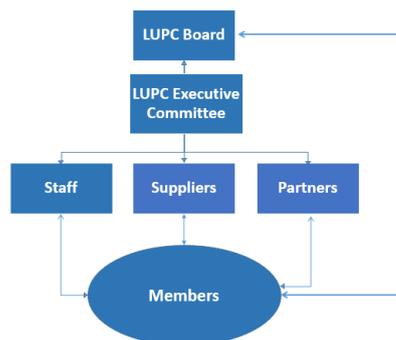
LUPC Modern Slavery Governance Structure

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 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

The [Strategy 2018-2021](#) 'Adding value through responsible procurement' detailed how LUPC will continue to support members in their efforts for supply chain transparency and how we work with suppliers to ensure they understand the benefits of responsible procurement and their own responsible business conduct obligations.

The [Responsible Procurement Policy](#) continues to be at the forefront of LUPC business operations and implemented with every supplier. Responsible procurement includes identifying, preventing and mitigating the risks of human rights abuses in the supply chain, including modern slavery, forced labour, child labour and human trafficking.

The [Responsible Procurement Strategy](#) was updated in December 2020. This sets out how LUPC will implement the Responsible Procurement Policy, including special projects related to human rights due diligence and awareness and prevention of modern slavery.

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 established by a working group including sustainability and procurement professionals, student representatives and NGOs. In 2020 it was endorsed by the HEPA Responsible Procurement Group as the recommended UK HE sector standard supply chain code of conduct. It shows LUPC's commitment to carry 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 second year](#). The accreditation demonstrates that LUPC has adopted and embedded ethical values in the way in which we source and manage suppliers.

[LUPC signs the SDG \(Sustainable Development Goals\) Accord](#), the University and college sectors response to the Global 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, business and wider society; and is a commitment learning institutions are making to one another to do more to deliver the goals.

RISK ASSESSMENT

Assessing the Risks Associated with Categories

One of the criterium 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 their supply chain mapping activity:

Category	Country
Laboratory consumables, including gloves	Malaysia, Indonesia, India, Pakistan
ICT equipment	China, India, Mexico, Taiwan, Brazil, Poland, Czech Republic, Malaysia, USA, Ireland, Philippines, Japan, Vietnam, Thailand, South Korea*
FairPhone	China, Japan, Korea, Taiwan, USA, Peru, Rwanda, Democratic Republic of Congo, Austria, Switzerland, Germany, Netherlands, Malaysia, South Korea *
Cleaning services	UK**
Security Services	UK**
Catering Services	UK**
Photography Services	UK**
Graduation gowns	UK, China
Office, computer and library supplies	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
Furniture	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.*



In order to better understand supply chains and identify potential risks, LUPC has begun mapping its supply chain (see below).

DUE DILIGENCE

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.

REPORTING ON GOALS FOR 2020-2021

1. Direct engagement with suppliers: Roll out supply chain evaluation (previously Sustain)

A key element of LUPC's due diligence process is the assessment and engagement of suppliers. In order to formalise this engagement, LUPC uses the Supply Chain Evaluation tool.

The tool was designed to enable LUPC to assess and understand the ethical, social, economic and environmental standards and practices of their suppliers. Through the tool suppliers are compelled to register their policies and practices on a series of categories.

The standards assessed through this tool are derived from minimum levels declared in the Sustain Supply Chain Code of Conduct. The aim being to highlight where supplier behaviour does not meet these minimum levels and to encourage change. An action plan is issued to the supplier by LUPC and periodically reviewed for improvement by both parties.

There was a delay in the roll out of this process of engagement with suppliers as a result of the COVID-19 pandemic. However, during this past year LUPC has tested the tool with one of the suppliers under the Waste Management Services framework agreement and has included the roll out of the tool in the General Laboratory Equipment, Legal Services, and the Estates and Facilities management framework agreements. LUPC will continue the evaluation of suppliers during the 2021-2022 financial year.

Working with the waste management supplier we were able to tweak the questions set, our communications and guidance to improve it ready for formal roll out. The supplier was issued an action plan and will be reviewed in 2021-2022.

2. Supply chain mapping

In order 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, engagement with members, suppliers and external organisations.

Textiles: LUPC examined the supply chains for graduation gowns. Textiles are generally produced in factories in China, Bangladesh, India, Vietnam, Cambodia and Turkey. Risks to human rights include modern slavery, child labour, exposure to chemicals and harmful working conditions.

Following the first part of this activity in [2019](#), we continued our supply chain mapping exercise for ceremonial gowns, we asked suppliers to look further down the supply chain to the 2nd tier on their supply chain, i.e. those who are providing the raw material for the gowns, again focusing on working practices and environmental impact. The full report can be found [here](#).



3. Review and update the Responsible Procurement Strategy

The [Responsible Procurement Strategy](#) was updated in December 2020. This Strategy sets out how we will implement our Responsible Procurement Policy through a Responsible Procurement programme during the period 2020-2022. It consists of a set of principles that we will adopt in our approach to Responsible Procurement, together with a series of specific projects, many of which are about promoting best practice in equality, diversity and inclusion.

4. 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.

The UK Universities Purchasing Consortia (UKUPC) is the partnership between eight UK consortia (including LUPC); a formal entity to support collaborative procurement within Higher and Further Education. A UKUPC Responsible Procurement Network has been established with the aim of achieving a consistent approach across the UK to responsible procurement throughout our activities.

The UKUPC have developed the following documents related to responsible procurement:

- A [set of questions and model answers](#) that relate to the United Nations Sustainable Development Goals (UN SDGs). The questions can be used at framework or call off level to further investigate potential suppliers' commitments and plans to manage their organisations and supply chains in accordance with the UN SDGs.
- A [responsible procurement glossary](#) to bring clarity to some of the terms we use. This document includes terms like child labour, bonded labour, debt bondage, etc.
- [Advisory document](#) for suppliers on how to write a good modern slavery document.

5. Student engagement and research on modern slavery

In January 2021, LUPC welcomed 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 her PhD and will continue to do so until completion. Her PhD will examine the impact of COVID-19 on public procurement supply chains. It will explore how best to use International Human Rights law and due diligence processes to prevent public buyers from contributing to future human rights violations in times of crisis, and remedies to the ones which have already taken place.

Martina has been involved in all LUPC projects related to modern slavery alongside our Responsible Procurement Lead.

6. Modern slavery work undertaken with LUPC members

The Responsible Procurement Lead carried out work placements with three of LUPC's members, the London School of Economics and Political Science (LSE), the Natural History Museum (NHM) and the Royal College of Physicians (RCP). At LSE she helped them use and apply the Electronics Watch procurement toolkit, supported them in writing their modern slavery statement and provided guidance for their ISO 20400 assessment.

At the NHM, she helped to get the most out of their membership of Electronics Watch, which all LUPC members are affiliated to, but many are not fully aware of the benefits this entails. She guided the procurement team on how to use the toolkit to apply the Electronics Watch contract conditions as fully as possible. This helped them identify the factory locations where their goods are being assembled. With this information, links can be established between the NHM and its ICT suppliers, strengthening their capacity to monitor workers' conditions in NHM's supply chains.



A key part of the Museum's Modern Slavery Statement is its commitment to utilise its Sedex membership to help it operate responsibly, protect workers and source ethically. One of their goals linked to their Sedex membership is to ensure that all garments worn by Museum staff and contractors, as well as all museum related garments for sale at retail outlets, are manufactured in factories that are subject to regular social audits.

The responsible procurement lead checked all their garment suppliers and contacted those who were not on Sedex (including indirect suppliers that provide uniforms for their front of house staff) to include them on their database. She then verified self-assessment questionnaires, social audits and workers information available. This information will now be used by the Procurement team to engage with suppliers to improve workers conditions in their supply chains. To learn more about this placement, click [here](#).

At the RCP, she helped them with their Electronics Watch affiliation and the best use of the public buyer toolkit. She assisted the procurement team with the ISO 20400 self-assessment and guided the team on how to start the process towards the ISO assessment, and reviewed their modern slavery statement to make sure it contains the mandatory information and helped create new content to reflect their current activity in this area. To learn more about this placement, click [here](#).

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.

7. 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.

8. 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 2021.

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

ADDITIONAL LUPC ACTIVITIES -2020 - 2021

Responsible Procurement Group

The LUPC and the Southern Universities Purchasing consortium (SUPC) have set up a joint [Responsible Procurement Group \(RPG\)](#), which replaced the respective regional responsible procurement groups. 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 begins with a presentation from an attendee, 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.

The first meeting was on 4th February 2021, where the London School of Economics and Political Science (LSE) presented their Sustainability Strategic Plan. There were 47 attendees, each of whom took away practical knowledge back to their organisation, which could then be implemented to improve their processes and impact their supply chain.

LUPC annual Responsible Procurement Event

In November 2020, LUPC delivered its Responsible Procurement event together with SUPC. 168 attendees heard presentations from the Ellen MacArthur Foundation and the University of Bristol on their sustainability activities. Attendees were able to take away some practical tips and actions back to their own organisations.

LUPC and SUPC also gave an update on all their Responsible Procurement activity as well as collaborative action being taken. This included how the new LUPC and SUPC Responsible Procurement Assessment Tool (RPAT) and the UN Sustainable Development Goals Question Set can assist responsible procurement activities of members. Access the write-up of the event [here](#) and the slides and recordings from the webinar [here](#).

We had excellent feedback, an example of which is below:

“The circular approach makes sense now in developing my category strategy. The case study presentation for Bristol University bought to life the next steps in embedding sustainability and the examples of the SDGs / TOMs assessment tool was very useful. I am feeling inspired and ready to start work with our Procurement Team.”

Electronics Watch

LUPC will continue 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 will promote 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.

LUPC work with Electronics Watch 2020-2021

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 was invited by both Electronics Watch and UNISON to present on its supplier engagement work in this area.

Electronics Watch worked to remediate forced overtime and recruitment fees in several manufacturing centres and the UK Government’s 2020 Modern Slavery Statement highlighted the work they do with Electronics Watch to tackle modern slavery in their ICT hardware and electronics supply chains. The Covid-19 pandemic created a shift towards precarious work and increased vulnerability to health and safety hazards, especially for migrant workers trapped in dormitories or workplaces during lockdowns. Electronics Watch hosted online discussions and exchanges with public buyers, monitoring partners, experts and worker leaders on the pandemic and the steps being taken to protect workers.



Terms of Engagement with the Responsible Business Alliance (RBA) to effectively engage companies in affiliates' supply chains were agreed in early 2021, which sets an effective platform for the sharing of information arising from worker-led monitoring with ODM factories and OEM brands including several parties on the NDNA framework. The goal is to improve compliance with relevant labour regulation and internationally recognized codes and worker rights standards for factories that make products for LUPC members and other public buyer affiliates to Electronics Watch. There will be an annual review and revisions to the terms based on feedback from Electronics Watch affiliates, RBA members and other stakeholders. Ahead of the next NDNA tender expected to be released in November 2021, the LUPC Senior Category Manager engaged with PC manufacturers to obtain in-the-field supply chain audit reports, an agreed position on the Electronics Watch Terms and Conditions and Gap Analysis and factory disclosure information down to tier 2 level.



TRAINING AND KNOWLEDGE EXCHANGE

Review modern slavery statements of suppliers

LUPC believes in its responsibility to contribute to the continued discussion on the identification, prevention, and elimination of modern slavery in supply chains. LUPC has participated in discussion around this vital subject with suppliers, members, civil society and academia.

In line with its supplier engagement approach LUPC analysed suppliers' Modern Slavery Statements from the top 20 suppliers based on spend and commodity risk categorisation. The [first reviewed](#) was carried out in April and the aim was to see whether the statements formally comply with the UK Modern Slavery Act 2015.

LUPC notified the suppliers of the results of the analysis and provided suggested points for development. The [next phase of our project](#) involved following up to make sure the suppliers acted on our recommendations, again with a focus on only the mandatory elements of their statement.

Suppliers have been receptive to our advice, and we are working with them towards improving their modern slavery statements.

LUPC continually works towards driving best practice and try to support its membership and suppliers in developing their activities addressing modern slavery risks.

During this year, LUPC published four magazine articles and five news stories related to modern slavery, to assist members in their understanding of the subject and to promote LUPC's work in this area.

Modern slavery public sector

LUPC has joined 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.

Contract management training

LUPC delivered free of charge training to its members on how to undertake effective contract management; this covered the effective setting of appropriate KPIs and the monitoring of these throughout the life of the contract.



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 2021-2022

- 1) Continue to undertake appropriate evaluation of suppliers using questions taken from the Supply Chain Evaluation tool, aim to evaluate as a minimum all suppliers on the General Laboratory framework (17 suppliers).
- 2) In collaboration with relevant stakeholders, undertake appropriate supply chain mapping activity for personal protective equipment (PPE) focusing on one product at a time.
- 3) 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.
- 4) 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.
- 5) Report on activity relating to preventing and addressing modern slavery undertaken with LUPC members during work placements delivered by the Responsible Procurement Lead.
- 6) LUPC will 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.
- 7) LUPC will be reassessed independently under the international standard ISO 20400:2017.
- 8) 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 LUPC Board on 17/09/2021 and will continue to be reviewed annually.



Don Bowman MCIPS
Director, LUPC

Date: 13/10/2021

