



**London Universities Purchasing Consortium**  
**Modern Slavery and Human Trafficking Statement**  
Year Eleven: A Review of August 2024 to July 2025

## **1. Introduction**

London Universities Purchasing Consortium (LUPC) is a non-profit organisation whose purpose is to provide professional procurement services to our members, delivering value for money, innovation, and sustainability.

We are one of eight purchasing consortia known collectively as UK Universities Purchasing Consortia (UKUPC). Together we tender and manage more than 100 framework agreements compliant with public contracts regulations for our members to use.

Established in 1968, LUPC's membership comprises universities and colleges of higher and further education, as well as other not-for-profit organisations in the arts, science, charity, and wider public sectors. Our small team is based in central London and works alongside procurement professionals and other experts from our membership base.

LUPC remains committed to supporting international human and labour 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 policies, approach and actions to identify, prevent and mitigate human and labour rights violations in its supply chains. It is written according to the guidelines provided in the Home Office's Transparency in Supply Chains (TISC) Statutory guidance published in March 2025.

As a public organisation, LUPC is not legally required to report under the MSA. LUPC's turnover is also below the threshold for businesses required to publish a statement. However, LUPC's Board considers that total spend on LUPC frameworks by UKUPC members of approximately £174m in this reporting period, warrants a statement on the Modern Slavery and human trafficking risks inherent in framework supply chains and the steps LUPC takes to address these. It is also consistent with our strategic objective to be a leader in responsible procurement.

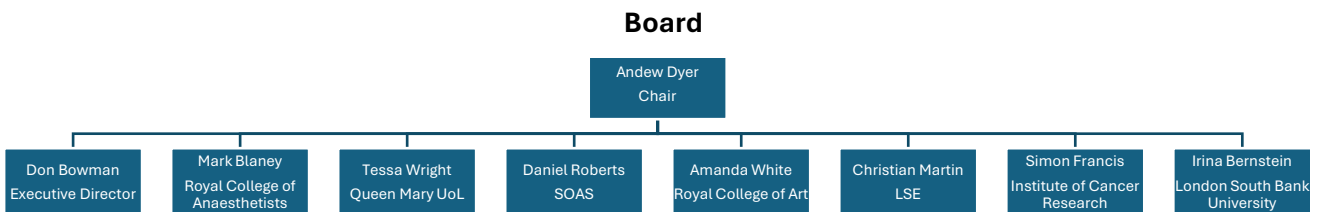
## 2. Organisational structure

### 2.1 Structure

LUPC's Articles of Association set out its constitution, responsibilities of its directors and the kind of business undertaken. They also define the contract between LUPC and its members.

As a company limited by guarantee, LUPC is led by a Board made up of senior directors drawn from members of the consortium. The Membership democratically elects all Board Members, with just one exception – LUPC's Director, who is accountable to the Board.

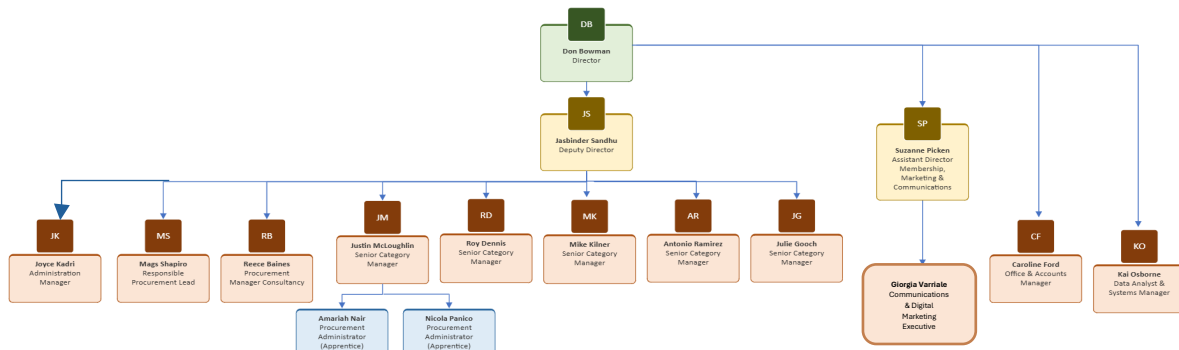
The Board is responsible for the strategic leadership and direction of the consortium. It elects the Chair and Deputy Chair, appoints the Director, sets the budget, publishes its Annual Report, Accounts, and executes all other duties and responsibilities commensurate with directing the company.



The Board meets four times annually and delegates day-to-day management responsibility to the Director and decisions as to operational priorities to LUPC's Executive Committee.



The LUPC team includes 13 permanent, full-time employees, one part-time employee and two apprentices.



## 2.2 Roles and responsibilities

Senior Category Managers tender framework agreements, appoint suppliers and conduct contract management for the lifespan of a framework agreement. Operational management of Senior Category Managers is undertaken by the Deputy Director with responsible procurement support (including Modern Slavery and Human Trafficking) from the Responsible Procurement Lead. Each role within the organisation contributes to addressing Modern Slavery and Human Trafficking. This includes the data and reporting support provided by the Data Analyst & Systems Manager, and marketing and communications by the Marcomms team, who report to the Director. The Director's role includes overall responsibility for policy, strategy, reporting, and external stakeholder engagement.

## 2.3 Our Supply Chain

Our own direct supply chain is small and dedicated largely to provision of services related to running our office (rent, utilities, stationery, IT support, accounting services) and occasional business travel, with around 10 regular suppliers, who are all locally based in the United Kingdom.

## 2.4 Framework Agreement Supply Chains

It is the supply chains of the framework agreement suppliers where we have greatest risk of Modern Slavery. Framework agreements fall within the following Categories:

<b>Estates &amp; Facilities Management</b>	<b>Professional Services</b>	<b>Labs &amp; Libraries</b>	<b>ICT</b>
Catering Outsourced Services	Legal Services	Laboratory equipment	eTendering
Cleaning & Security Services	Graduation and Ceremonial Gowns, Photography and Events Services	Office, computer and library supplies*	Desktop & Notebook (NDNA)
Maintenance & Minor Works	Debt Recovery		Mobile Phones - ethically sourced
Waste Management Services (Sustainable)	Occupational Health		
	Carbon Offsetting Validation Services		
	Temporary Staff*		

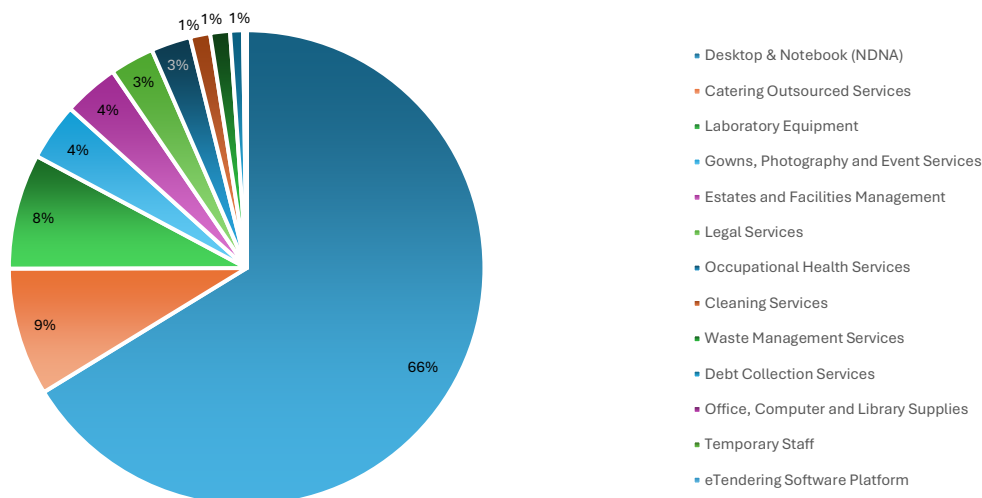
\*Expired frameworks, but still with call off

Current LUPC Framework Agreements cover contracts with just over 120 suppliers.

Spend by UKUPC members against LUPC framework agreements of approximately £174m this reporting period is as follows:



## Spend against LUPC Framework Agreements FY 24/25



While the spend is not that of LUPC itself, responsibility for design and management of the framework agreements creates leverage over the supply chain and a level of responsibility for human rights due diligence. By far the LUPC framework attracting highest spend is the Desktop and Notebook Agreement (66%), followed by Catering Outsourced Services (9%), Laboratory Equipment (8%), Estates and Facilities Management (4%), Graduation and Ceremonial Gowns, Photography and Event Services (4%), Legal Services (3%), Occupational Health Services (3%), Cleaning Services (1%), Waste Management Services (1%) and Debt Collection Services (1%) and others below 1%.

### 3. Organisational policies

Our approach to addressing Modern Slavery sits within our broader approach to Responsible Procurement.

The **LUPC Strategy 2024 - 2028** details how the organisation will continue to enhance its position as a leader in responsible procurement through I. Inspiring a responsible procurement movement among our suppliers and members. II. Using our influence to support the development of responsible procurement practices. III. Supporting and enabling suppliers and members to maximise and achieve shared sustainability aspirations IV. Embedding sustainability into our culture. V. Providing resources to enable members and suppliers to track progress on their responsible procurement journey.

Our **Human and Labour Rights Policy** sets out our commitment to protecting human and labour rights, with a focus on framework agreement supply chains. It includes actions LUPC has taken and those it is planning to take to identify and manage risks, as well as to respond to potential and actual instances of abuse. This policy is implemented through adopting the **SUSTAIN Supply Chain Code of Conduct**, using the **UKUPC Responsible Procurement Risk Matrix** to rank risks and determine the focus of **LUPC's Supply Chain Due Diligence questionnaire** housed on the LUPC RP Hub.



## 4. Assessing and managing risk

### 4.1 UKUPC Sustain Supply Chain Code of Conduct

The Sustain Supply Chain Code of Conduct is adopted by all UKUPC consortia and is available for adoption by members. It sets out our expectations of framework agreement suppliers across economic, social and environmental themes. These include prohibition of forced or child labour, human trafficking and ensuring decent work and compliance with modern slavery legislative requirements. At tender stage, framework agreement suppliers sign the code of conduct to indicate their commitment to follow its content.

### 4.2 UKUPC Risk Matrix

The Risk Matrix is used by UKUPC consortia and members and provides a risk rating by Commodity Code across themes covered by the SUSTAIN Code of Conduct, including a specific risk rating for Modern Slavery. The risk rating provides an indication of the level of due diligence required at tender and contract management stage.

Using spend data and the risk rating for Modern Slavery, we can map Modern Slavery risks to focus due diligence efforts:

Spend	High			NDNA Lab equipment Catering
	Medium	Legal Services Debt Recovery	Gowns, photography & events	Estates & FM (minor works) Cleaning & Security Waste
	Low	Office supplies Temp Staff eTendering Carbon Offsetting Services Taxi (exec) Mobile Phones (ethical)		
		Low	Medium	High
		Risk		

Risk identification is supported through our affiliations with Electronics Watch, for global worker-led monitoring in ICT, as well as Unseen who run the UK Modern Slavery Helpline. We have provided a [button](#) on the RP pages of our website, which includes a webform and the helpline telephone number. This is a confidential and independent service operated by Unseen UK, providing advice and guidance to anyone experiencing or concerned about Modern Slavery.

LUPC is a founding member of Electronics Watch, an organisation that aims to protect the labour rights and safety of workers in global electronics supply chains supplying the



public sector. Since 2017, LUPC has paid for all full Members to be Electronics Watch affiliates; providing guidance, resources and contract clauses that support responsible procurement. Electronics Watch continues to connect public sector buyers with workers' rights experts, who conduct worker-driven monitoring across Information and Communication Technology (ICT) supply chains, driving compliance and improving working conditions. This involves engaging with resellers, manufacturers, the industry, and other stakeholders to follow up on contract conditions. LUPC provides Electronicswatch with framework agreement supplier details, products included in framework agreements and continuous work is undertaken to obtain and share tier 2 supplier details. LUPC and all full members receive monthly monitoring reports, highlighting rights abuses discovered and an indication of when and how it is appropriate to act to support remedy.

In addition to our affiliations with Unseen and Electronicswatch, LUPC is open to receiving complaints on human and labour rights abuse in any of the framework agreement supply chains. Media is also scanned for reporting of any abuses.

## **5. Due Diligence & Remediation in relation to modern slavery**

Actions to manage risks depend on the risk level identified. LUPC believes in long-term engagement with its framework suppliers, on the issues of modern slavery and human trafficking, and wider human and labour rights in global supply chains. Therefore, it integrates requirements on these topics throughout the procurement process, from initial evaluation via the Supplier Questionnaire (SQ), to tender drafting and evaluation, and during contract management.

We amended our terms and conditions this year to include a requirement for all framework agreement suppliers to complete the supplier due diligence questionnaire on LUPC's RP Hub, our online portal, which launched during this reporting year. This replaces the SDDT reported on in previous Modern Slavery Statements.

Our due diligence questionnaire does not focus on Modern Slavery and Human Trafficking alone, but on broader human and labour rights issues as well. This is to recognise that situations of extreme exploitation are often brought about by the violation of multiple human and labour rights – and that therefore a comprehensive approach is needed to ensure that they do not escalate.

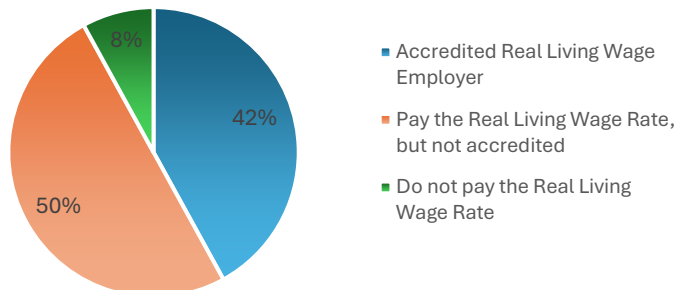
Beyond providing evidence of a Modern Slavery Statement, suppliers are also asked to outline the human and labour rights risks they have identified in their supply chain, system for managing risks and remediation process. Suppliers are also encouraged to register as data contributors on Open Supply Hub and are asked for evidence of their own supply chain code of conduct, practices around supplier's committing to their code and supplier chain due diligence practices.

Additionally, studies have demonstrated that providing workers with a living wage has an influence on ensuring decent work and preventing modern slavery and human trafficking. LUPC continue to be an accredited member of the Living Wage Foundation, completing an





**LUPC Framework Agreement Suppliers  
Real Living Wage Rate Employers reported via  
RP Hub  
FY 24/25**



annual confirmation of LUPC salaries aligned to the Real Living Wage rate. We ask suppliers to indicate whether they are accredited by the Living Wage Foundation and encourage those who are not yet members to join.

Each question response in the due diligence questionnaire, including evidence

provided, is evaluated and suppliers are provided with recommended actions and useful resources. Once action plans are agreed, Members can view supplier progress reports.

Those suppliers who fall into medium and high-risk categories for Modern Slavery are prioritised for participation in government's Modern Slavery Assessment Tool (MSAT) and receive a more in-depth evaluation of Modern Slavery questions on the RP Hub.

#### **Electronics Watch and LUPC**

Electronics Watch celebrated the 10th anniversary since its foundation in another busy year that included the active monitoring of 36 factories employing 209,483 workers, along with eight mines with 482 miners. Ten new affiliates and a new monitoring partner joined during the year, with individual affiliate projects including assisting the Government of Canada's central purchasing agency to build internal and vendor capacity to identify and address forced labour in its ICT supply chains. The year saw a 7% increase in the number of contractors disclosing factory locations and given 88% of the sites disclosed in 2024 were at component level, this pointed to growing market acceptance of traceability requirements.

Training was delivered on worker-driven monitoring in Taiwan, Malaysia, the Philippines and Thailand while achievements included the negotiation and signature of a collective bargaining agreement, measures to address sexual harassment affecting student interns, the reimbursement of recruitment fees to migrant workers trapped in debt bondage, and the repayment of overdue bonuses. Collaboration with trade unions around the world was further strengthened, exemplified by meeting trade unions representing 200,000 electronics workers in South Korea.

LUPC continues to play an active role and in conjunction with Electronics Watch and assists with linking PC device sales made through the National Desktop and Notebook Agreement (NDNA) to member specific monitoring and remediation activities undertaken through the quarterly Monitoring Status Reports issued to each affiliate. This work includes the ongoing updating of the supplier-completed Factory Disclosure Forms and regular questioning as part of the responsible procurement standing item on the NDNA review meeting agenda. Members from the consortium participated in the Annual Electronics Watch Conference held 6-7 November in Brussels, whose theme was "Public Procurement and the Evolving Due Diligence landscape." This brought together 118 participants from 75 organisations across 27 countries to advance



due diligence in global supply chains. LUPC was asked to speak on its activities in connection with the NDNA framework with a focus on successful supplier dialogue and ongoing engagement and continues to engage with other public sector buyers looking to develop their due diligence in a similar direction.

LUPC is committed to working with civil society partners, affiliates and suppliers to ensure investigation takes place into reported incidents of Modern Slavery and is committed to supporting continuous follow up to achieve worker-centred remedy. Our approach to remediation ensures support for suppliers to meet the terms of remediation agreed, with termination of a contract only considered as a last resort, if a supplier is obstructive. If termination is considered, priority will be given to the potential further negative impact on rights-holders affected by the harm.

## 6. Training

LUPC collaborates and shares learnings around Modern Slavery via membership, affiliation, and joint initiatives with:

- [UKUPC](#)
- [The Business, Human Rights and Environment Research Group \(BHRE\)](#), University of Greenwich
- [Electronics Watch](#)
- [Unseen](#)
- [Higher Education Procurement Association \(HEPA\)](#)
- London Responsible Procurement Network
- International Working Group on Ethical Public Procurement (IWGEPP)
- Action Sustainability's Supply Chain Sustainability School
- NHS Commercial Services

We also share learnings informally with:

- Canadian Inter-University Working Group on Sustainable Procurement

We are a member of the Global Electronics Council Technical Committee on Corporate ESG Performance, and in this reporting period we continued to give our input as public sector buyers on the Responsible Supply Chains Criteria document, which has now been concluded.

Modern Slavery resources on our website include a free Modern Slavery e-Learning course. Updates regarding Modern Slavery appear regularly in our quarterly e-zine, Linked.

## 7. Monitoring and evaluation

**Current Reporting Period: 2024/25**

	2024/2025 Actual	2024/2025 Target	Cumulative Actual	Cumulative Target
Number of framework agreements where supplier due diligence questionnaire has been rolled out	7	6	12	11
Number of suppliers on active framework agreements who have completed the supplier due diligence questionnaire	31	35	51	60





	2024/2025 Actual	2024/2025 Target	Cumulative Actual	Cumulative Target
Percentage of total suppliers who have completed the supplier due diligence questionnaire	n/a	n/a	42%	50%
Percentage of suppliers who have completed the SDDT, who have responded with a Corrective Action Plan (CAP)	n/a	n/a	4%	25%
Number of Modern Slavery-related improvements attributed to the supplier due diligence process	0	New KPI 2024/25		
Framework agreements with Tier 1 mapped	12	11	12	11
Framework agreements with Tier 1 & 2 mapped	0	1	1	2
Framework agreements with updated Modern Slavery risk mapped	12	11	12	11
Number of complaints of Modern Slavery received	0	0	0	0
Percentage of complaints of Modern Slavery resolved	No complaints	New KPI 2024/25		

**Next Reporting Period: 2025/26**

**Our goals for the next reporting year include:**

- Piloting data contribution on Open Supply Hub for one framework agreement
- Rolling out the Member View of framework agreement supplier reports on LUPC's RP Hub
- An Enhanced Member login, which will allow Members to administer the supplier due diligence questionnaire with their direct suppliers.

	Current	2025/2026 Target	Cumulative Target
Number of framework agreements where supplier due diligence questionnaire has been rolled out	12	2	14
Number of suppliers on active framework agreements who have completed the supplier due diligence questionnaire	51	25	76
Percentage of total suppliers who have completed the supplier due diligence questionnaire	42%	n/a	61%
Percentage of suppliers who have completed the SDDT, who have responded with a Corrective Action Plan (CAP)	4%	10%	14%
Framework agreements with Tier 1 mapped	12	2	14
Framework agreements with Tier 1 & 2 mapped	1	1	1
Framework agreements with updated Modern Slavery risk mapped	12	2	14
Resolution of received complaints of Modern Slavery	None received		

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

This statement was approved by the LUPC Board on 11 December 2025.



**Don Bowman**  
**Director**  
**11 December 2025**

