



# London Universities Purchasing Consortium Modern Slavery and Human Trafficking Statement

Year Nine: A Review of August 2022 to July 2023

## 1. 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.

We are one of six regional higher education purchasing consortia in the UK working collaboratively alongside two specialist sector purchasing organisations and are 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 is made up of 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. Our small team is based at its Fitzrovia office location 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 and approach to identifying, preventing and mitigating Modern Slavery, human trafficking, forced and bonded labour and human and labour rights violations in its supply chains.

As a public organisation, LUPC is not yet covered by the requirements of the UK MSA – although it is acknowledged that the UK Government has committed to changing this. Additionally, LUPC's turnover is below the threshold for businesses required to publish a statement. However, LUPC's Board considers that total member spend, approximately £259m in this reporting period, through our framework agreements, warrants a statement on the Modern Slavery and human trafficking risks inherent in its supply chains and the steps LUPC is taking to address these. It is also consistent with our strategic objective to be a leader in responsible procurement.

After describing the organisational structure of LUPC, this statement sets out LUPC's approach in addressing modern slavery and human trafficking, actions taken in our 2022-2023 financial year and finally our goals for 2023-24.



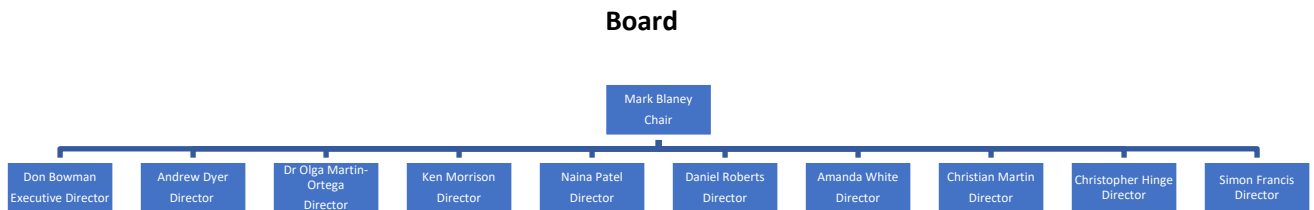
## 2. ORGANISATIONAL OVERVIEW

### 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. All Board Members are democratically elected by the membership with just one exception – LUPC's Director, who is accountable to the Board.

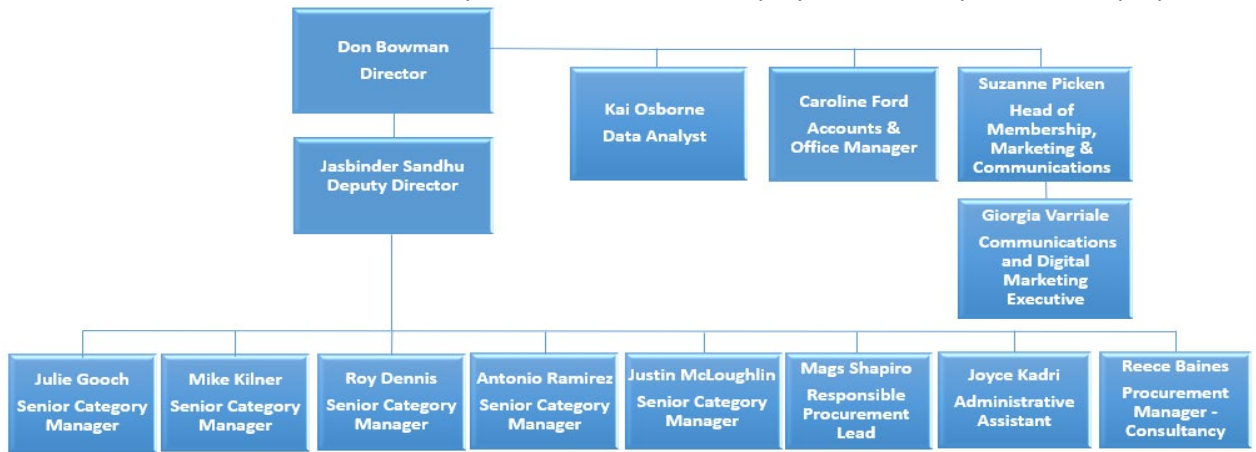
The Board is responsible for the strategic leadership and direction of the consortium. It elects the Chair and Deputy Chair, appoints the Director, sets the budget, publishes its Annual Report and Accounts and executes all other duties and responsibilities commensurate with directing the company. The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



### Executive Committee



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



## 2.2 Roles and responsibilities

Senior Category Managers tender framework agreements and appoint suppliers; conducting 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, who is also supported part-time by a PhD student. 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, 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 relatively 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

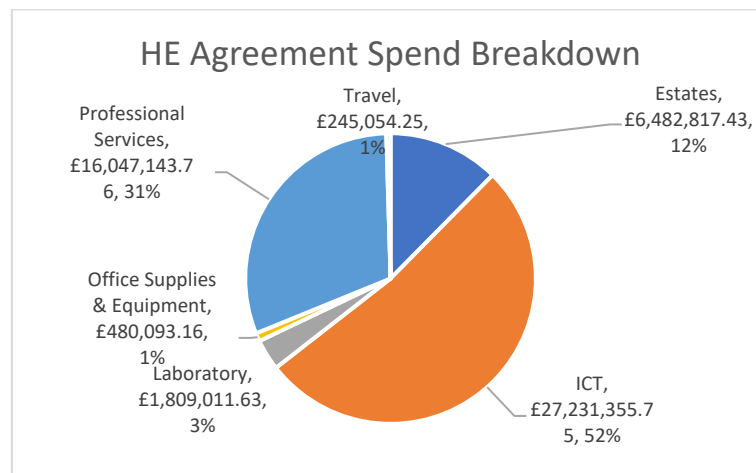
It is the supply chains of the framework agreement suppliers where we have greatest leverage in terms of addressing Modern Slavery, due to the amount of spend, impact on our members and complexity of supply chains. Framework agreements fall within the following Categories:

<b>Estates</b>	<b>Professional Services</b>	<b>Labs &amp; Libraries</b>	<b>ICT</b>
Estates and Facilities Management – cleaning, security & reception	Legal Services	Laboratory equipment	eProcurement System
Catering – outsourced & consulting	Graduation and Ceremonial Gowns, Photography and Events Services	Office & Library supplies & equipment	Desktop & Notebook (NDNA)
Waste Management Services	Debt Recovery		Mobile Phones - ethically sourced
	Occupational Health		
	Insurance Brokerage Services		
	Carbon Offsetting Validation Services		
	Travel: taxis		

LUPC Framework Agreements cover contracts with over 130 suppliers.



Spend by LUPC's 86 Full Members and 84 Associate Members (largely Further Education Colleges) and Restricted Associate Members (members with access to a limited number of our frameworks) against LUPC framework agreements this reporting period is spread as follows:



While the spend is not that of LUPC itself, responsibility for design and management of the framework agreements creates some leverage over the supply chain and creates a level of responsibility for proportionate human rights due diligence.

### 3. APPROACH TO ADDRESSING MODERN SLAVERY AND HUMAN TRAFFICKING

#### 3.1 Policies, Recognition and Commitments

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

Our work on combatting Modern Slavery, in particular, has been recognised as both innovative and public sector leading. <sup>1</sup> We have worked with our members, other HE consortia, research institutes, the wider UK public sector and international organisations in delivering projects and conducting research, building and producing resources on preventing Modern Slavery and human trafficking. LUPC's [Responsible Procurement Strategic Plan](#), published in June 2022, is due to be updated in 2024. Building on the organisation's maturity in responsible procurement, the strategy will focus on deeper supplier development and engagement, which will include Modern Slavery.

In alignment with other consortia who make up UKUPC, LUPC undertakes to ensure all framework agreement suppliers sign a commitment to the [SUSTAIN Supply Chain Code of Conduct](#), which outlines expectation in terms of governance, economic, environmental and social practices, including Modern Slavery.

We have been awarded the Chartered Institute of Procurement & Supply (CIPS) Corporate Ethics Mark for the third consecutive year. Organisations displaying the mark have signed a Statement of Commitment to ethical sourcing and supplier management and have taken proactive steps to safeguard against unethical conduct. The Mark is a way for an organisation that commits to ethical procurement to be recognised by CIPS through a publicly accessible register.

<sup>1</sup> ActionSustainability ISO20400:2017 Assessment Report



### 3.2 Human Rights Due Diligence: Risk Assessment and Management

LUPC looks to sector, as well as location, when assessing supply chain risk for Modern Slavery. Using the Higher Education Procurement Association (HEPA) Commodity Risk Analysis Tool for sector input and our own research into origin of goods and location of suppliers for services, we continue to update our risk maps and adjust due diligence efforts accordingly.

Due to the nature of the work, wage and skill levels, use of agencies and sub-contractors, as well as geographies, LUPC categories of highest risk for Modern Slavery have been identified as:

<b>Estates</b>	<b>Professional Services</b>	<b>ICT</b>
Estates and Facilities Management		
Waste Management Services	Graduation and Ceremonial Gowns, Photography and Events Services	
Cleaning Services		
Security Services: Guarding & Reception		Desktop & Notebook (NDNA)
Catering Outsourced Services		

LUPC takes several actions to manage risks, depending 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.

Actions to manage this risk include prioritising the roll out of the government's Modern Slavery Assessment Tool (MSAT) to suppliers on the above identified higher-risk framework agreements, as well as affiliation with Electronics Watch in the ICT category.

MSAT is a modern slavery risk identification and management tool. It has been designed to help public sector organisations work in partnership with suppliers to improve protection and reduce the risk of exploitation of workers in their supply chains. It also aims to help public sector organisations understand where there may be risks of modern slavery in the supply chains of goods and services they have purchased. The assessment consists of six prevalent themes: Governance, Policies & Procedures, Risk Assessment, Due Diligence, Training and KPI's. There are 35 possible recommendations that can be generated for suppliers dependent on answers as guidance on improvements. Twenty-two possible risk flags can be raised as a result of Supplier responses throughout the assessment. The system includes functionality to allow buyer organisations to collaborate on any shared supplier. Scores are Red, amber or green dependant on percentage score achieved: 70-100% = green, 40-69% = orange, 20-39% = yellow, 0-19% = red. Guidance is available for both buyers and suppliers throughout the tool, including step by step 'how to's' and legislation guidance. LUPC was invited to give feedback on the tool, which was well received by the Cabinet Office.

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 of its 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 monitor Information and Communication Technology



(ICT) supply chains, driving compliance and ultimately improving working conditions. This involves engaging with resellers, manufacturers, the industry, and other stakeholders to follow up on contract conditions.

Due diligence is conducted broadly across categories throughout the tender process, including an initial evaluation via the Supplier Questionnaire (SQ) in line with Procurement Policy Note (PPN) 03/23; the Invitation to Tender (ITT) and during contract management via LUPC's Supplier Due Diligence Tool (SDDT) Version 3.

The SDDT is a questionnaire completed by framework suppliers, which includes confirmation of policies and practices in place and submission of evidence. After evaluation, a custom report is prepared for each supplier providing proposed corrective actions as well as useful references to support improvements. The objective is to measure supplier progress and to guide design of supplier development programmes. Our overarching aim is to use our leverage to stimulate a responsible procurement movement, where suppliers reach higher and further with our support.

Key areas reviewed are:

<b>Environmental</b> Carbon	<b>Social</b> Human Rights & Modern Slavery Diversity, Equity & Inclusion Social Value	<b>Governance</b> Ethics
Supply Chain Monitoring		
Sustainability Strategy		

In the SDDT, LUPC does not focus on Modern Slavery and Human Trafficking alone, but on broader human and labour rights issues. 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. Suppliers are required to outline their approach to identifying human and labour rights risks overall, as well as any actions in place to manage them and remedy abuses identified. Additionally, studies have demonstrated that providing workers with a living wage is a crucial first step in ensuring decent work and preventing modern slavery and human trafficking. LUPC continue to be an accredited member of the Living Wage Foundation, completing an annual confirmation of LUPC salaries aligned to the Living Wage rate. Through our SDDT exercise, we ask suppliers to indicate whether they are accredited by the Living Wage Foundation and encourage those who are not yet members to join as part of corrective actions proposed.

LUPC plans to make the SDDT a mandatory requirement for all frameworks, to ensure that all suppliers undergo an initial assessment, regardless of risk.

See below Section 4 for details of how LUPC has engaged with suppliers on the MSAT and through its SDDT in the reporting year and Section 6 for plans for the next period.

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 and Electronicswatch provides a channel for the ICT framework agreements. Developing a more formalised system of gathering and responding to complaints is a key part of our Responsible Procurement strategy moving forward and is further covered in Section 6.





### 3.4 Training, Engagement and Collaboration

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](#);
- [Higher Education Procurement Association \(HEPA\)](#);
- London Responsible Procurement Network
- International Working Group on Ethical Public Procurement (IWGEPP)
- Home Office Modern Slavery Committee for the Public Sector
- Action Sustainability's Supply Chain Sustainability School

We also share learnings informally with:

- Canadian Inter-University Working Group on Sustainable Procurement
- Australasian Universities Procurement Network

During this reporting period, LUPC facilitated member participation in research to explore and uncover links between the climate crisis and Modern Slavery globally by the Modern Slavery and Human Rights Policy and Evidence Centre (Modern Slavery PEC). The project was one of three designed to provide evidence and guidance to policymakers to ensure that robust legislation and policies are in place to meet the increasing intersection between these two major global challenges.

We continue to host Modern Slavery resources on our website, with 28 unique logins to our free Modern Slavery e-Learning course in the reporting period. Updates regarding Modern Slavery appear regularly in our quarterly e-zine, Linked.

## 4. REPORT ON 2022 – 2023 GOALS

### 4.1 Supplier Due Diligence Tool

In the reporting period, 43 suppliers from three framework agreements have completed the SDDT: Estates, Legal Services and Laboratory Equipment, yielding an 80% completion rate. In terms of Modern Slavery, a key area of focus for supplier development, based on evaluation of SDDT responses, is supply chain risk mapping. This will be one of the first training modules for suppliers and will be open to all LUPC framework suppliers to attend.

### 4.2 MSAT

In 2022, LUPC required suppliers on the Estates framework to complete the MSAT. Rollout was paused as the Government reviews and updates the tool. We provided feedback on the tool based on our experience with the Estates framework suppliers and our own completion of MSAT for our organisation and use of the report generated.

### 4.3 Modern Slavery in Tenders

The Responsible Procurement Lead, supported by our PhD student, was involved in supporting category managers in tender processes of frameworks for debt recovery, occupational health and waste management services. Depending on risk, tender documents include tailored questions on how suppliers manage their human and labour rights impacts in their supply chains.

### 4.4 Supply chain mapping

For the ICT Category, ongoing supply chain mapping processes are in place in concert with Electronicswatch, who work with in country monitors and workers' rights groups to identify and address



rights abuses, including Modern Slavery. The number of ICT brands willing to provide supply chain transparency increased from 20 to 43 including component suppliers linked to individual product models.

Through the SDDT process, we aim to gather Tier 2 information and have updated the tool to improve data gathering.

#### **4.5 Student engagement and research on Modern Slavery**

During the reporting period, LUPC took part in an exciting project with the Universities of Surrey, Bath, and the West of England, titled 'Intersecting sustainabilities: Protecting both people and planet in supply chains'. The project was funded by the Modern Slavery and Human Rights Policy and Evidence Centre (Modern Slavery PEC). It contributes to knowledge and practice by addressing the scant research on sustainability in public sector purchasing, with special emphasis on the overlap between climate- and modern slavery-based measures. While the connection between climate change and modern slavery is increasingly acknowledged, the efforts to tackle these issues in supply chains have often been pursued independently. The project aims to fill this gap by formulating evidence-based recommendations for policymakers, public sector purchasing managers, and supply chain managers regarding the interconnectedness of climate change and modern slavery.

Our Responsible Procurement Advisor is completing her PhD in the Business, Human Rights and Environment (BHRE) Research Group at the University of Greenwich, partly sponsored by LUPC. In 2022-23, she has been researching how to support the provision of worker-driven remedy through public procurement, and has been actively collaborating with Electronics Watch, currently developing a framework for worker-driven remedy. In October 2022, together with the Danish Institute for Human Rights and Electronics Watch, she delivered a training and workshop on worker-driven remedy for public buyers, attended by LUPC's Responsible Procurement Lead. Additionally, research findings are reflected in the SDDT updates, increasing the focus on addressing and remediating human and labour rights issues in global supply chains.

#### **4.6 Modern Slavery member placements**

Our new Responsible Procurement Lead joined the team in May 2023. A strategic decision was taken to pause member placements for the rest of the year, with a focus internally on our own practice. Prior to that the previous Responsible Procurement Lead undertook member placements at: Horniman Museum and Gardens and British Museum. These placements included supporting members to gain full benefit from affiliation with Electronics Watch as well as conducting supply chain due diligence on Modern Slavery and producing Modern Slavery Statements.

#### **4.7 London Living Wage Foundation**

LUPC continue to be an accredited member of the Living Wage Foundation, completing an annual confirmation of LUPC salaries aligned to the Living Wage rate. Through our SDDT exercise, we ask suppliers to indicate whether they are accredited by the Living Wage Foundation and encourage those who are not yet members to join as part of corrective actions proposed.

#### **4.8 ISO 20400: 2017**

LUPC was reassessed against the ISO20400: 2017 standard for Sustainable Procurement in June 2023. The assessment includes a review of our risk management, stakeholder engagement, key performance indicators (KPIs) and grievance mechanism. We maintained our position as "leader" and received a positive report from the assessors, who confirmed LUPC were among only a very few organisations to maintain a leadership position and have invited us to present our approach to responsible procurement in a cross-sector collaboration, including our work on Modern Slavery. A key action arising from the assessment process is the establishment of a grievance mechanism for suppliers to mitigate negative





impacts in supply chains, providing access to remedy for affected stakeholders. Further details on our plans in this area can be found in Section 6.

#### 4.9 Investigating claims

No claims were received in the reporting period.

Highlights of **Electronics Watch** activity across the year include undertaking monitoring partner training in Thailand and Democratic Republic of Congo (DCR), worker training in the Philippines and Bolivia, migrant worker training in Taiwan, the return of unfair recruitment fees to workers in Malaysia and presenting at Australia’s Modern Slavery Conference. LUPC and other affiliates continue to receive news through the popular *Monthly Affiliate e-newsletter*. The number of ICT brands willing to provide supply chain transparency increased from 20 to 43 including component suppliers linked to individual product models.

The *Affiliate Exchange for Impact* in Barcelona was Electronics Watch’s first in-person event since Covid, sparking ideas and connections that will guide their work in several ways. A detailed summary of the event and key takeaways remains available for download from their [website](#), which also includes several other resources. Full members of LUPC can request access to affiliate-only information by emailing [Martina Hooper](#) at Electronics Watch.

In March 2023, Electronics Watch and the Responsible Business Alliance (RBA) updated the [Terms of Engagement](#) previously agreed in 2021. The terms define how the two parties and their members engage to remediate worker rights issues, with the new terms including several improvements. The number of factories in their database has correspondingly increased from 100 to 200 over the last year, and with several local regulatory acts likely to assist the work of Electronics Watch on the horizon, these are exciting times for the organisation.

LUPC continues to play an active role and in conjunction with Electronics Watch, 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. LUPC is also a participant within a Europe-wide working group looking into how living wage standards can be defined and potentially set as a realistic target for the ICT industry at a global level.

## 5. MODERN SLAVERY-RELATED KPIS: AUGUST 2022 – JULY 2023

Number of framework agreements where SDDT has been rolled out	2
Number of suppliers who have completed the SDDT	34
SDDT completion rate (completed questionnaires/number of requests to complete)	94%
Framework agreements with Tier 1 mapped	2
Framework agreements with Tier 1 & 2 mapped	1
Number of suppliers who have completed the MSAT	11
Number of complaints of Modern Slavery received	0

## 6. 2023 – 2024 GOALS

### 6.1 Policies

One of the key actions emanating from our ISO20400 assessment during this reporting period, was the development of a formal grievance mechanism. Given the limited resources, the breadth and sphere of



control of LUPC in framework agreement supply chains, we are exploring the development of a Human Rights & Environment Due Diligence (HREDD) Policy, which will detail our approach to supply chain risk mapping, due diligence, grievance system, access to facilitation of investigation and worker- and community- driven remedy as appropriate. This will include a complaints channel and links to worker and environmental rights protection agencies, at minimum in the United Kingdom, such as [Unseen](#) who provide a UK Modern Slavery and Exploitation Helpline and support. This will align with our internal grievance system and UKUPC's Whistleblowing Policy.

## 6.2 SDDT

We will continue to roll out the SDDT, on a risk-rated basis, to a new category at minimum every quarter (total 4 framework agreements), with collection of Corrective Action Plans (CAPs) within 3 months of providing suppliers with an SDDT report and evaluation of CAPs within 1 month of receipt, recording improvements via our KPIs. LUPC plans to make the SDDT a mandatory requirement for all framework suppliers, to ensure that all suppliers undergo an initial assessment, regardless of risk.

## 6.3 MSAT

We will roll out the MSAT to suppliers on the framework agreements identified as highest risk for Modern Slavery – a total of seven agreements.

## 6.4 Addressing Modern Slavery in Contract Management

We continue to develop a consolidated supplier management database, which summarises risk and supplier progress in responsible procurement, including Modern Slavery with the view to the Responsible Procurement Lead supporting Senior Category Managers with the responsible procurement aspect of contract management.

## 6.5 Update of risk register

Working in collaboration with the UKUPC Responsible Procurement Network, a mechanism for updating the risk register, including Modern Slavery Risks, will be developed.

## 6.6 Tier 1 & Tier 2 supply chain maps

We will continue to build on risk mapping efforts and document responsible procurement risk maps for framework agreements, including Modern Slavery.

## 6.7 Supplier Responsible Procurement Portal

In the next reporting period, we will revamp the Responsible Procurement section of our website, to explain our due diligence process, publish policies and host a supplier Responsible Procurement Portal, which will include supplier development programmes including Modern Slavery.

## 7. MODERN SLAVERY-RELATED KPIS: TARGETS AUGUST 2023 – AUGUST 2024

	2023/2024 Target	Cumulative Target
Number of framework agreements where SDDT has been rolled out	4	6
Number of suppliers who have completed the SDDT	34	70
Percentage of total suppliers who have completed the SDDT	New KPI 2023/24	
SDDT completion rate (completed questionnaires/number of requests to complete)	90%	85%
Percentage of suppliers who have completed the SDDT, who have responded with a Corrective Action Plan (CAP)	New KPI 2023/24	



Number of Modern Slavery-related improvements attributed to the SDDT	New KPI 2023/24	
Framework agreements with Tier 1 mapped	2	8
Framework agreements with Tier 1 & 2 mapped	1	5
Framework agreements with updated Modern Slavery risk maps	0	10
Number of suppliers who have completed the MSAT	11	30
Percentage of total suppliers who have completed the MSAT	New KPI 2023/24	
Number of complaints of Modern Slavery received	n/a	
Percentage of complaints of Modern Slavery resolved	New KPI 2023/24	

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

This statement has been approved by LUPC Board on 8 December 2023 and will continue to be reviewed annually.



**8 December 2023**

