



London Universities Purchasing Consortium Slavery and Human Trafficking Statement

Year Six: A Review of August 2019 to July 2020

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 the environment.

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

This statement is designed to satisfy the requirements of Section 54 of the [Modern Slavery Act 2015](#), by informing members, staff, and public stakeholders about LUPC and its policy with respect to 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 the risks.

LUPC turnover is less than the threshold for businesses required to publish a statement. However, LUPC's Board considers that total spend, around £209m 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.

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:

Laboratory Consumables and Equipment (including but not limited to):

- Consumables and chemicals
- Laser equipment
- Life science equipment
- Personal protection equipment and clothing
- Laboratory gases and equipment (supply and, installation)

Library resources (including but not limited to):

- Books
- E-books and equipment
- software and maintenance

Professional Services (including but not limited to):

- Ceremonial gowns and photography services
- Financial services
- Insurance services
- Debt recovery services
- Legal services

Estates Goods and Services (including but not limited to):

- Catering services
- Security services
- Cleaning services
- Waste management services
- Furniture and furnishing

ICT Equipment and Services (including but not limited to):

- Audio visual
- Desktops and notebooks
- Software and network equipment

Office supplies and equipment (including but not limited to):

- Office, computer and library supplies
- Paper
- Print solutions
- Promotional merchandise



88 full members, an additional 35 from further education institutions and 59 associate members use LUPC frameworks to purchase goods and services under these categories.

How about we say, LUPC contracts with and therefore directly influences 171 suppliers. Working alongside other HE consortia nationally, it has influence over 1100 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, Responsible Procurement Advisory Group, staff, suppliers, members and partners.

LUPC has created a new role, a dedicated Category Manager: Responsible Procurement (CMRP). This 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 are 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' details 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.

The Responsible [Procurement](#) Policy was updated on September 2020. This 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 forced labour, child labour and human trafficking.

The [Responsible Procurement Strategy](#) 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.



The [Sustain Supply Chain Code of Conduct](#) is mandatory for all bidders to agree to during the tendering process. It shows LUPC's commitment to carry out procurement activities in an environmentally, socially, ethically and economically responsible manner.

LUPC has been awarded the [Chartered Institute of Procurement & Supply \(CIPS\) Corporate Ethics Mark](#). To gain the accreditation, LUPC has taken proactive steps in the last 12 months to safeguard against unethical conduct in procurement and supply management, reinforcing our focus on sourcing responsibly. The Ethical Procurement and Supply accreditation focuses on issues including corruption, fraud, bribery, exploitation, and human rights abuses in supply chains.

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 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 deems the corresponding high-risk source countries to be as follows:

Category	Country
Laboratory consumables, including gloves	Malaysia, Indonesia, India, Pakistan
ICT equipment FairPhone	China, India, Mexico, Taiwan, Brazil, Poland, Czech Republic, Malaysia, USA, Ireland, Philippines, Japan, Vietnam, Thailand, 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 2019-2020

1. Roll out Sustain

A key element of LUPC's due diligence process is the assessment and engagement of suppliers through the tool Sustain Supply Chain Evaluation (Sustain). Sustain is a redevelopment that merges the LUPC tool "Equiano" with the "SUSTAIN" tool developed by the [Advanced Procurement for Universities and Colleges](#) (APUC). After a period of significant change, the new Sustain tool has been jointly developed by LUPC and APUC. The tool enables LUPC and APUC members to assess and understand the ethical, social, economic and environmental standards and practices of their suppliers. In the future, other UKUPC members may be able to access Sustain to engage with their suppliers.

The standards assessed are derived from minimum levels declared in the Sustain Supply Chain Code of Conduct, which was established by a working group including sustainability and procurement professionals, student representatives and NGOs and has last been reviewed in March 2020.

There has been a delay in starting this process due to delays in procurement activity as a result of the COVID-19 pandemic. LUPC had planned to begin evaluating suppliers awarded under the retender of the General Laboratory Equipment framework this year; however, the impact of Covid-19 on this market has resulted in this being pushed back to 2021.

2. Supply Chain Mapping

In order to assess the human rights risks involved in its supply chains, LUPC aims to understand the origin and production and delivery methods of the products and services its members procure through its agreements. The first step is therefore mapping the supply chain of products and services in risk categories. This process involves desk research, engagement with members, suppliers and external organisations. In this process, LUPC aims to use its resources strategically to further map the supply chains, particularly with high-risk sector suppliers, supporting its members to further understand and take their own actions to prevent and mitigate such risks.

Textiles:

As part of its commitment, LUPC has 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.

LUPC contacted all suppliers to request audit reports for their supply chains, followed up with questions and asked what steps had been taken to implement the changes recommended by the auditors. The full report can be found [here](#).

Personal Protective Equipment:

Following on from a Channel 4 investigation that revealed significant human rights abuses in the supply chain for the production of personal protective equipment (PPE), LUPC approached PPE framework suppliers to confirm the processes they use to mitigate abuse.



This [report](#) provides details on the action taken by LUPC and framework suppliers' responses, demonstrating their joint commitment to responsible procurement in PPE supply chains.

Mobile phones:

LUPC leads the [Mobile Phone – Ethical Sourced](#) framework agreement, where [Fairphone](#) is the supplier. Fairphone has publicly available a [supply chain map](#) and it divides its suppliers into supplier, processor and manufacturer. They also have information about their [impact in their supply chain](#).

3. Percentage of goods procured by country and by category

Category	Framework Agreement Name	Contracted Value Identified	Percentage and Country
Professional services	Ceremonial gowns and photography services	100%	100% China
Office supplies and equipment	Office, computer and library supplies	18.72%	China 25.2%, Germany 23%, Austria 20.4%, UK 8.7%, Malaysia 8.2%, Finland 4.4%, Portugal 2.7%, India 1.3%, France 1.2%, Belgium 1.2%, Estonia 0.9%, EU 0.7%, Brazil 0.6%, other 1.6%
Estates goods and services	Catering services	100%	100% UK
Estates goods and services	Security services	100%	100% UK
Estates goods and services	Cleaning services	100%	100% UK
Estates goods and services	Waste management	100%	100% UK
Estates goods and services	Furniture and furnishing	5.03%	59% UK, 31% Poland and 10% Ireland.

4. Risk assessment plan for LUPC events

LUPC started the risk assessment plan for staff participating in its main events with its annual conference. A questionnaire was sent to the event venue to understand and identify risks for workers, especially subcontracted workers such as cleaning, security, catering and hospitality. Although the venue responded and engaged with LUPC on this project, the conference was cancelled due to COVID-19 restrictions.

The risk assessment plan will be revisited at the next face-to-face event.

5. Modern Slavery KPIs

It was previously mentioned that the modern slavery KPIs will be measured within the new system Sustain. This will continue to be the case and as explained in point 1 of this statement, LUPC will start work using Sustain in 2021.

6. Special projects outlined in the Responsible Procurement Strategy

As mentioned, LUPC established a new role in 2020, a dedicated Category Manager for Responsible Procurement (CMRP). Her role is to ensure that responsible procurement is embedded across all LUPC's operations, assist LUPC senior category managers in their procurement activity and to support LUPC members in their responsible procurement activity.



The Higher Education Procurement Association (HEPA) has established a responsible procurement group, which has been divided into subgroups for specific areas. The CMRP is the leader of the modern slavery and human rights subgroup and LUPC's Director is one of the leaders on the social value subgroup. LUPC has representation on all the other sub-groups.

7. Responsible Procurement Policy and Strategy review

LUPC's responsible procurement policy and strategy will be reviewed every two years. This will be in accordance with the recommendations set up by its independent assessment under the international standard ISO 20400:2017.

8. External collaboration

LUPC completed a project for the Organization for Security and Co-operation in Europe (OSCE), working with the University of Greenwich's Business, Human Rights and the Environment research group (BHRE). This international consultancy assisted the OSCE in delivering policies and procedures to mitigate the risks of modern slavery issues in their supply chains.

Our work with BHRE to assess the impact of our modern slavery eLearning and other activities related to human rights in public supply chains is ongoing. The analysis of our current activity will help us to develop further work with an emphasis on socially responsible and sustainable procurement.

ADDITIONAL LUPC ACTIVITIES 2019-2020

Responsible Procurement Advisory Group

The LUPC has a further due diligence mechanism through its own '[Responsible Procurement Advisory Group](#)' (RPAG) with clearly defined terms of reference setting out its responsibilities. The RPAG steers LUPC's responsible procurement work, by having strategic decision-making power over its Responsible Procurement Policy and Strategy. The Group provides a network for members to learn and share knowledge and advice with the goal of spreading shared and understanding of responsible procurement.

RPAG meets quarterly and is comprised of sustainability managers, procurement managers and students drawn from LUPC's membership and other relevant groups.

LUPC annual Responsible Procurement Event

Since 2015 LUPC has been hosting responsible procurement events jointly with the BHRE at the University of Greenwich, bringing together academics, public procurement professionals and civil society. In June 2019 this event took an international dimension and was co-organised with the Ministry of Labour and Social Affairs of the Czech Republic. This Sustainable Procurement Forum hosted public buyers from Czech Republic and Slovakia, who were interested in learning from LUPC's leading practices and strategies on sustainable public procurement, protecting and promoting human rights in the supply chain of the public sector.

In November 2019 LUPC hosted their first annual responsible procurement event for its members. Presentations included how to embed responsible procurement within organisations, how to include the Electronics Watch terms and conditions in call-off competitions, how to report under the Modern Slavery Act section 54 and a session from The Energy Consortium on renewable energy. The event, that was attended by over 50 people, provided the opportunity for delegates to network, share best practice, discuss current challenges, and take away some practical tips on how to implement responsible procurement terms in tender

Responsible Procurement support to members



The CMRP undertakes work placements for LUPC members. The first placement was at the London School of Economics (LSE) for a period of ten weeks, two days a week. During this time, the Category Manager supported the procurement and the sustainability teams in different areas, including providing feedback on their modern slavery statement and collaborating with Electronics Watch to gather relevant information from their ICT suppliers.

LUPC checked members for compliance with the Modern Slavery Act, section 54, and also gave direct feedback to all of them. The CMRP supported the creation of the modern slavery statement of about eight members.

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 2019-2020

LUPC has 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. LUPC has supported members with the completion of the Electronics Watch Public Buyer Toolkit, which supports communication and promotes contract performance compliance within affiliates' supply chains.

Electronics Watch published a document looking at important lessons from a successful campaign to gain compensation for migrant workers at Cal-Comp's factory in Thailand. The workers had been charged excessive and unlawful recruitment fees and related costs equivalent to 30-90 days of their wages. The Cal-Comp reimbursement is the single largest settlement of migrant worker recruitment fees in any one company globally. The [report](#) identifies the role LUPC and other purchasing consortia can play: "There is thus also a vital role for market actors who can create demand for and enforce high industry standards."

COVID-19: Following the publication of the recommendations outlined by the Economics Rights Institute and Electronics Watch, LUPC's Senior Category Manager leading the National Desktop and Notebook (NDNA) framework, wrote to all suppliers (Dell, HP, Lenovo, Dynabook (Toshiba), Acer, Stone and XMA) with a summary of the concerns raised in the paper, together with an article that endorsed the view that workers in China were now working under intense pressure.

LUPC received a number of responses from the brand OEMs and did follow-up in a number of areas including whether effective measures had been put in place by the OEMs to replace in-person monitoring at their ODM partners for example. We will continue to monitor the situation and apply pressure on the supply chain to ensure compliance with legal requirements to protect workers' rights.



EFFECTIVENESS OF LUPC POLICIES AND PROCEDURES

In order to understand the impact of its policies and procedures LUPC needs to measure its effectiveness. LUPC has been assessed against the international standard for sustainable procurement ISO 20400:2017 scoring 4.33 out of 5 in its re-assessment in December 2018, an improvement from the 3.75 achieved in the initial assessment two years earlier. LUPC has committed to re-assessment every 2 years. The assessments are available on LUPC's [website](#).

TRAINING AND KNOWLEDGE EXCHANGE

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.

The Cabinet Office published a [Procurement Policy Note](#) and [guide](#) for UK Government departments, to ensure modern slavery risks are identified and managed in their supply chains. This guide was aimed to help practitioners to identify and manage modern slavery risks in existing contracts and new procurement activities and it gives particular recognition to '[Protecting Human Rights in the Supply Chain](#)', a guide for public procurement practitioners by Professor Olga Martin-Ortega and former LUPC director, Andy Davies.

LUPC was shortlisted as a finalist in partnership with The University of Greenwich in the research with impact institution category for Equiano – human rights risk assessment tool at the Green Gown Awards celebrated in November 2019. The engagement tool was designed to gather information to help identify the risk of human rights abuses in public supply chains. LUPC has now integrated Equiano into Sustain, a wider supplier risk assessment tool.

At the beginning of 2020, the University of Greenwich and the Royal Society of Arts (RSA) hosted an event to promote human rights in the textile industry. The CMRP presented LUPC's work on responsible procurement, especially within the ceremonial gown services framework agreement. The panel 'Ensuring accountability: the role of government, corporations, workers and public buyers' had as speakers: Ben Vanpeperstraete, who explained his work supporting the legally binding Bangladesh Accord on Fire and Building Safety; Seema Joshi, an independent corporate accountability expert, who talked about characteristics the textile industry shares with other supply chains; and LUPC's Category Manager, who talked about the purchasing power of the public sector to influence supply chains and their responsibility to procure sustainably.

During this year, LUPC published six articles and seven different news related to modern slavery in its quarterly magazine Linked, to assist members understand the subject and to promote LUPC's work in this area.

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 2020-2021

- 1) Roll out Sustain, the supplier assessment and engagement tool, to all suppliers on new frameworks. LUPC will start this process with the General Laboratory Equipment, Estates and FM services and Legal Services framework agreements in the spring of 2021. Modern slavery KPIs will be measured within the Sustain.



- 2) Complete supply chain mapping activity beyond tier 2 in categories such as ceremonial gowns, laboratory equipment mapping and ICT equipment and any other high-risk area. LUPC will work with other universities purchasing consortia, members and suppliers on this.
- 3) Review and update the Responsible Procurement Strategy by the end of 2020 (and every two years subsequently), to ensure it delivers the latest best practice in due diligence and effectiveness in combatting modern slavery.
- 4) Collaborate externally with multiple partners to deliver guidance, policies and strategies that will help in raising awareness, understanding, and combatting modern slavery.
- 5) Further develop student engagement and research on modern slavery. LUPC is collaborating with the University of Greenwich in the project 'Protecting Human Rights in Global Supply Chains in times of Pandemic and the Role of Public Procurement'. This project is partly funded by LUPC, and the PhD candidate undertaking the research will spend part of their time working closely with LUPC
- 6) Report on activity relating to modern slavery undertaken with LUPC members during work placements delivered by the CMRP.
- 7) 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.
- 8) LUPC will be reassess independently under the international standard ISO 20400:2017.

This statement has been approved by LUPC Board on 11/12/2020 and will continue to be reviewed annually.



Don Bowman MCIPS

Director, LUPC

Date: 11/12/2020

