

THE UNIVERSITY OF LEEDS

THE COUNCIL

Modern Slavery and Human Trafficking Statement 2022-23

Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It informs our students, staff, suppliers, stakeholders, community, and the public about the steps that we have taken, and will take, to mitigate any risk of modern slavery, human trafficking, forced and bonded labour and labour rights violations within our organisation and supply chains. This statement covers the 12-month period to 31 July 2023.

We monitor and categorise concerns reported to us (either via our Whistleblowing procedure or any other channel). There were no allegations of potential modern slavery in 2022-23.

About the University

The University of Leeds is an independent corporation established by Royal Charter, granted in 1904 and is globally renowned for the quality of its teaching and research. The University is one of the largest higher education institutions in the UK with more than 39,800 students, over 9,200 staff and a turnover of £930 million (2021-22).

Governed by its Council, the University is committed to meeting its social, economic, and environmental responsibilities. Driven by its values of collaboration, compassion, inclusivity and integrity, the University is unwavering in its commitment to meeting the requirements of the Act and will take all reasonable steps to ensure that modern slavery or human trafficking does not occur in any part of our organisation or supply chains.

In 2022, the University set out its [Policy on Responsible Investment](#) explaining the commitment to ensuring the University in which it invests adopt high ethical standards and responsible attitudes towards the environment and human rights.

Our supply chain

Procurement

The University's Financial Policy and Guidelines govern the procurement of goods, works and services. We are committed to sustainable procurement and our approach to delivering this is set out in our Sustainable Procurement Standard and associated Sustainable Procurement Procedure, both part of our [Environmental Management System](#). We have developed our approach to sustainable procurement using the Department for Environment, Food and Rural Affairs (DEFRA) [Flexible Framework for Sustainable Procurement in Government](#) and have self-assessed to Level 4.

The University is a member of the "The University Caterers Organisation" (TUCO), the "North East Universities Purchasing Consortium" (NEUPC), and "The Energy Consortium" (TEC), all of which are members of "UK Universities Purchasing Consortia" (UKUPC). NEUPC, TUCO, and TEC have all published their own Modern Slavery Act 2015 (Transparency in Supply Chains) Statements.

The University has adopted a continual improvement approach to monitoring its supply chains and through the appointment of a Sustainable Procurement Specialist will continue to collaborate with suppliers to gain a greater understanding of the source of supply.

Following the introduction of the Modern Slavery Act 2015, the University updated all procurement documentation and processes to enable more initiative-taking steps to

investigate and act upon any indications of modern slavery or human trafficking evidenced in the supply chains upon which we rely. Before the University awards contracts of significant value, suppliers must confirm compliance with the Act, and confirm that they will support our ambitions in this regard.

The University appointed a Sustainable Procurement Manager to deliver continuous improvement in the approach of Purchasing through:

- Maintaining an overview of risks in Purchasing activity
- Embedding tackling modern slavery and human trafficking within the Category Plans and Purchasing strategies
- Managing training and improving provision of tools and resources
- Improving supply chain transparency through supplier engagement and continuous improvement.

Category Management

The University takes a category-led approach to procurement. Our categories include:

- Hard Facility Management and Construction
- Soft Facility Management (incorporating commercial operations)
- IT
- Laboratory Products and Services
- Workshop and Engineering Supplies
- Professional Services
- Office Supplies
- Travel

The University's Purchasing and Sustainability Services facilitate the delivery of sustainable procurement through the category management process, seeking continuous improvement. The University has assessed each category in terms of risk against sustainability good practice, including the consideration of human rights issues and risks in the supply chains. The Purchasing team review risk levels annually with consideration to changes in markets, risks and geo-political issues.

Analysis of our supply chains in relation to the Act focuses on the first-tier supplier base. The categories identified as likely to bear the greatest risk in first-tier supply are Hard Facilities Management, Construction and Soft Facilities Management (including catering and cleaning services). We are aware that these categories rely on lower paid workers to deliver the service and are sectors where modern forms of slavery or human trafficking may be more likely to occur. To mitigate this, the University's suppliers which operate in these industries have been categorised into thirty-one sub-groups to facilitate a more granular approach to both sourcing and management.

Other high-risk areas include IT and Laboratory products, owing to the complexity of the supply chains within these industries and the wide range of components and hazardous materials used in manufacturing.

The University is a member of both national and sector-specific groups such as [Electronics Watch](#), which helps to mitigate and manage human rights violations in our IT supply chains. The University is working with Electronics Watch conducting product reviews, starting with the key items we use, to improve supply chain transparency and identify any concerns requiring intervention. Electronics Watch have expertise and resources to undertake these checks and lead any interventions to ensure best outcomes for those at risk. Work is also ongoing to understand how we can best use the resources and tools on offer within our IT Category to improve awareness and minimise risk in the end-to-end contract lifecycle.

The University also uses the NETpositive Supplier Engagement Tool to help Category Managers monitor and combat modern slavery and human trafficking in the supply chain.

Employment of staff

The University's commitment to securing the rights of our staff is set out in our institutional [HR policies and procedures](#).

Key HR policies of relevance to the Modern Slavery Act are:

- The [Equity, Diversity and Inclusion Strategy 2022](#) which sets out the University's commitment to promoting equality across campus and also states corporate and individual responsibilities to adhere to the principles of the policy.
- The [Code of Practice on Whistleblowing](#) sets out a process by which concerns can be raised.
- The [Policy on Dignity and Mutual Respect](#) sets out expectations about how everyone should be treated on campus.

Training

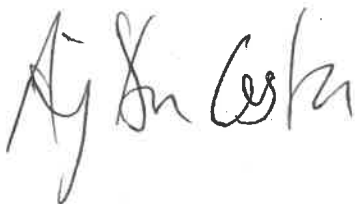
The University is committed to raising awareness of the risks of modern slavery and human trafficking in our organisation and supply chains. The University delivered Social Value training to its procurement team in 2020-21 and further training on Protecting Human Rights in the Supply Chain in 2022-23.

To further enhance our understanding of modern slavery and human trafficking risks, all category team members are either working towards, or are Chartered Institute of Procurement and Supply (CIPS) -qualified; follow the [CIPS Code of Conduct](#); and, where possible, have completed the CIPS Ethical Procurement and Supply course giving them Chartered Status.

Future Plans

The University will review this statement annually to ensure continuous improvement in minimising the risk of modern slavery and human trafficking in supply chains. Over the coming year we will:

- Strengthen engagement with suppliers in high-risk categories to ensure they are aware of and committed to the Modern Slavery Act's requirements.
- Re-launch of NETpositive Supplier Engagement Tool with key suppliers, to encourage self-assessment and development of supplier improvement plans. Improve utilisation of plans within the Contract Management lifecycle.
- Continuously review and update procurement documentation and processes to proactively identify and address indications of modern slavery.
- Continue collaborating with Consortia and external partners such as Electronics Watch to conduct product reviews and improve transparency in the supply chain.
- Implement ongoing training and awareness programs for procurement team members and contract managers, to ensure they are well-informed about the risks of modern slavery and human trafficking and know how to respond to any concerns.
- Promote awareness of the Whistleblowing policy as a means for employees and stakeholders to report concerns related to modern slavery or human trafficking.



Alastair Da Costa
Chair of Council
30 November 2023