

ANTI-SLAVERY TRANSPARENCY STATEMENT

Introduction

This statement constitutes the University of Lincoln's anti-slavery and human trafficking statement for the financial year ending 31st July 2019. The University is legally required to publish an annual statement by section 54 of the Modern Slavery Act 2015.

Modern slavery is an overarching term to describe all forms of contemporary slavery including human trafficking, slavery, servitude, forced, bonded and child labour. This statement sets out the steps the University has taken, and will take in the coming year, to tackle this issue. It covers both our own workforce and how we will address the prevention of modern slavery in our supply chains.

We have robust recruitment procedures in place to ensure that there is no possibility of slavery in our institution's workforce and we are committed to using our procurement activities to combat modern slavery in our supply chains.

Organisational structure

The University of Lincoln is a Higher Education Corporation and, as an exempt charity, operates on a 'not for profit' basis. Its primary activities are the provision of world class teaching and research. The University is organised into four academic colleges (Colleges of Arts, Science and Social Science and the Lincoln International Business School) which are supported by a number of Professional Services (non-academic) departments.

Our recruitment practices

We employ circa 2,300 employees (this figure includes associate lecturers) and we have a thorough set of employment related policies and procedures that prevent any possibility of modern slavery occurring within our workforce. Our Human Resources (HR) department and recruiting managers follow a recruitment policy and processes which are regularly reviewed for compliance with legislation.

At the time of application, potential employees have to provide 'right to work' information which is checked at interview by our HR team. The majority of interviews are conducted face-to-face which ensures that individuals have freely chosen to attend. All application forms are verified as being the applicant's own information, including taking a copy of the interviewee's original passport and any additional 'right to work' documentation (where applicable).

Where interviews are conducted via Skype or other electronic means, the candidate is required to present their original passport and other additional 'right to work' documentation (where applicable) in person to HR before their start date or on their first day. All employees receive a written contract of employment. HR also provide information to all new employees on their statutory rights including sick pay, holiday pay and other benefits they may be entitled to.

These actions combined with the University's commitment to pay the Living Wage mean that we can be confident in stating that there is no modern slavery in our directly employed workforce.

Our supply chains

We have great diversity in the types of purchases we make through our supply chains. Our ICT and Estates departments are responsible for many of our high value contracts with

suppliers. ICT requirements include IT systems, hardware and telecoms; Estates have requirements including capital works, facilities management, building maintenance and energy. Our other high value expenditure categories include travel, laboratory equipment and consumables, library materials, food supplies and professional services.

The University purchased from over 2,400 different suppliers in the last financial year. The suppliers who we directly purchase from are known as our 1st tier suppliers. These 1st tier suppliers, in turn, trade with their own supply chains (at the 2nd tier, 3rd tier and so on) to produce and offer the goods, services and works that the University requires.

Our 1st tier suppliers range from locally based micro businesses through to large global companies. Whilst we have not mapped our supply chains, it is clear that each tier can open up a supply network within which multiple suppliers are involved, to a greater or lesser extent, in supplying to the University. For a project such as the construction and fit out of our new Medical School building during 2019/20, there will be hundreds of companies involved in the extended supply chain by contributing a mix of labour, materials, plant/equipment hire and professional services.

The vast majority of our 1st tier suppliers are based in the UK where industrial activity is not a common source of modern slavery. Only a small proportion of the University's purchases have been from overseas suppliers in the 2019/20 financial year.

Typically, the overseas suppliers we have directly purchased from either operate in high-tech industries in developed countries or are providers of professional services; the risk of modern slavery is less prevalent in these areas. Suppliers in certain countries can pose a greater risk of modern slavery occurring. The Global Slavery Index (researched and published by Walk Free) has identified ten countries which have the highest vulnerability to modern slavery. In the last financial year, the University has not directly purchased from suppliers in any of these ten countries.

In some areas of our spend, such as ICT hardware, manufacturing activity will take place entirely overseas with the products being shipped in a finished state into the UK. Supply chains in such cases are multi-layered and multinational. It is not practical for the University to map such complex supply chains and we will instead seek to work with our 1st tier suppliers to encourage them to take positive action on managing modern slavery risk further down the supply chain.

Actions taken in this financial year

A number of actions have been undertaken by the University in the last financial year (2018/19) in regard to anti-slavery, these are as follows:

IT hardware category review

The Global Slavery Index also identified that the products imported into the UK which are at most risk of being produced with slavery in the supply chain are laptops, desktop computers and mobile phones. Therefore, we have reviewed how the original equipment manufacturers (OEMs) of these devices are tackling the issue of modern slavery. The OEMs we predominantly use (HP and Apple) for these products have current anti-slavery statements which evidence that they are taking considerable action on this issue through the likes of supplier audits and assessments, codes of conduct and targeted risk analysis.

However, instances of modern slavery practices have been found in the supply chains of both HP and Apple. Where this has occurred, both OEMs have demonstrated a commitment to remediation and corrective actions. Given the complex and interwoven nature of the

electronics componentry and assembly supply chains involved in the manufacture of these devices, the University does not consider that changing its OEM suppliers would have a positive effect in tackling modern slavery. Terminating our existing contracts on such grounds is considered to be counter-productive as this may cause the OEMs to be less transparent in future.

Construction category review

Construction is a major spend category for the University and one which can lead to exposure to a higher than average risk of modern slavery occurring within the supply chain. This could occur within both the labour force engaged through main contractors and within the supply chains of raw materials and products. Continual cost and margin pressures combined with a reliance on subcontracting in this sector increases the potential risk of modern slavery.

We have reviewed the anti-slavery statements of our contractor appointments for the University's construction projects planned for the 2019/20 financial year. Whilst our appointed contractors are open in that they still have more work to do in this area, we have assured ourselves that they taking appropriate actions to mitigate modern slavery risks. In particular, BAM Construction Limited, who have been appointed as the main contractor for the construction of our landmark Lincoln Medical School building, have demonstrated that they are developing a robust approach to this issue.

Temporary staff supplier review

Following a tender process, the University appointed a new agency provider for its temporary administrative and clerical staff requirements. After their appointment, University staff visited the provider's local branch to fully review their recruitment practices from applicant registration through to issuing contracts of temporary employment (between the recruitment agency and its agency workers). Evidence of appropriate documentation was witnessed during this site visit and we are confident that our contracted provider has sound recruitment and employment practices which do not give rise to any risk of modern slavery.

New supplier form

When adding new suppliers to our Finance system database, the University uses a form to obtain various information from any new supplier which is used to establish their supplier record details. We have amended this form to raise awareness of the Modern Slavery Act and it now requires new suppliers to confirm if they are subject to the Act and, if so, to provide a link to their latest anti-slavery and human trafficking statement. The form provides a link to government guidance on the Act in the event that the new supplier is not aware of this legislation.

Future plans

In the next financial year (2019/20), the University intends to take the following actions as part of our initiatives to play a role in combatting modern slavery:

Office stationery

The University's contract for office stationery is due to be re-let in 2019/20. Office stationery products can be at a higher than average risk of modern slavery in their manufacturing processes. Some stationery items are typically produced in countries where there are risks that labour standards may be lower than the UK's and which may become compromised by suppliers in order to manufacture at the lowest possible cost. As part of the process of

establishing a new stationery supplies contract, the University will undertake appropriate due diligence in regard to the issue of modern slavery.

Staff training

Staff working in the University's Procurement Team will complete an e-learning course on 'Protecting Human Rights in the Supply Chain' hosted by HEPA (who are the recognised sector body for higher education procurement). This course has been designed specifically for public procurement practitioners and covers a range of topics relevant to undertaking anti-slavery measures in a public procurement environment, such as that of the University.

Monitoring good practice

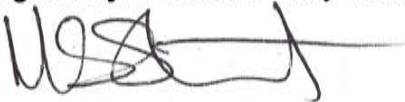
We will continue to maintain an awareness of good practices in managing modern slavery risks in higher education supply chains through engagement with various sector level forums. In addition, we will also maintain awareness of good practice beyond the HE sector by reviewing guidance published by the Chartered Institute of Procurement & Supply and other bodies who are engaged in providing advice and guidance on anti-slavery activities.

Spend analysis

Each year we undertake an analysis of the University's external supplier expenditure. This provides a comprehensive picture of what we buy and who we buy it from. We will again use this information to identify any changes in our buying patterns and the countries that we purchase from. This will help to inform any newly emerging modern slavery risks that the University will need to address.

This statement has been approved by the University's Board of Governors and will be revised annually.

Signed by: Professor Mary Stuart CBE



On behalf of University of Lincoln
Date: 13 November 2019