Modern Slavery Act Statement

2019/20
Lancaster University
Slavery and Human Trafficking Statement

This Statement is designed to satisfy the requirements of Part 6 of the Modern Slavery Act 2015, by informing our students, staff, campaigners and the public about Lancaster University and its policy with respect to modern slavery, human trafficking, forced and bonded labour and labour rights violations in its supply chains.

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

We are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Lancaster University’s slavery and human trafficking statement for the financial year 2018/19.

Organisational structure and Staff Activity

Lancaster University is a research-intensive Higher Education institution in North West England, which operates on a global scale both in terms of student recruitment and research collaborations. Established by Royal Charter in 1964, Lancaster University currently has a turnover of around £290M, with an international student body of more than 14,000 students across four Faculties.

In addition to the main campus at Lancaster, the University has significant international teaching partnerships, and works in many other countries through research and exchange programmes.

Modern Slavery and Human Trafficking have both been areas of research for the University. The Pentland Centre, a University Research Centre that promotes sustainability in business, focuses aspects of its research on the realities of global supply chains, and attempts to identify key success factors and the roots of ongoing systemic problems, including modern slavery. Similarly, the Violence & Society UNESCO Centre, a coalition of researchers based in eight departments across three faculties at Lancaster University, has a key research focus on human trafficking. The University will continue to research these areas and work to influence key policy and decision-makers.
Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

Our workplace policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

The University sees a natural synergy between its actions in relation to the Modern Slavery Act and others related to human dignity, liberation and respect. The University has a number of policies in place to support and promote equality of opportunity, diversity and human rights. These include an Equality, Diversity and Inclusion Strategy that sets out how we apply our policies so that we are a fair and equitable employer.

Lancaster University also has established and robust complaints and whistle-blowing procedures, enabling staff and students to raise issues relating to modern slavery and labour rights violations through appropriate channels.

Our policies are available to all staff via our intranet site, and training in equality and diversity is mandatory for all new staff.

Equality, Diversity and Inclusion Committee oversees this area and reports to Council.

Our supply chains

Lancaster University has an expenditure with suppliers of around £80M annually plus a varying Capital budget. The University applies robust Financial Regulations and operates a centralised procurement model to manage this expenditure appropriately.

Our supply chain includes:

- Estates-related Works, Goods and Services
- Office Solutions
- Laboratory Consumables and Equipment
- Library
- Professional Services
- ICT Equipment and Services
- Catering
- Travel
Due diligence processes for slavery and human trafficking

To mitigate the risk of slavery and human trafficking occurring in our supply chain, purchasing is carried out centrally by the Procurement Team and all orders are subject to agreed Terms & Conditions that include an obligation to comply with the Modern Slavery Act 2015. The Procurement Team have undergone advanced training in the Modern Slavery Act and in Protecting Human Rights in the supply chain. In addition, all expenditure competitively tendered includes a pre-qualification stage with further checks undertaken on legal compliance.

The University makes use of a large number of Higher Education sector-wide contracts. These Framework Agreements also mandate compliance with the Modern Slavery Act 2015 and suppliers are subject to further compliance checks. Collaboration with other Universities means that we can increase our buying power and our influence on suppliers.

One example of this is Desktops and Laptops which we buy via sector-wide agreements. Through our regional purchasing consortia we have membership of Electronics Watch, an independent monitoring organisation working to achieve respect for labour rights in the global electronics industry.

On an annual basis we re-assess our supply chain and identify areas of potential risk.

Supplier adherence to our values

We have zero tolerance of slavery and human trafficking. To ensure suppliers are aware of our values, our tender documents and standard Terms & Conditions include clauses supporting this commitment to protecting human rights in our supply chain.

Across our supply chain we use an online tool for recording supplier sustainability activities which includes activities relating to modern slavery. All our contracted suppliers are asked to sign up to this HE Sector wide tool called NETpositive Supplier Engagement. Through our programme of Contract Management, we work with our key suppliers to develop their responses in the NETpositive Supplier Engagement tool.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. Along with training the Procurement Team, in excess of 300 members of staff have undergone training on how to identify and mitigate the risk in our supply chain.

Effectiveness of the steps we have taken and future plans

We have reviewed the effectiveness of the steps we have taken to ensure no slavery or human trafficking exists in our supply chains and intend to take further steps to combat slavery and human trafficking.
We have repeated our annual exercise to map the high-risk areas within our Tier 1 supply chain and recorded the steps key suppliers are taking to mitigate risk. We plan to extend this work during 2019/20.

We have continued to mandate a commitment to the Modern Slavery Act 2015 for all contracted suppliers and all tenders carried out during 2018/19 have included additional checks. For 2019/20, we have added a statement to our tender documentation, requesting suppliers work with us to further map their supply chains and record mitigating actions.

We play an active role in the management of sector-wide frameworks agreements and supported our regional purchasing consortia in gaining membership of Electronics Watch on our behalf. In 2019/20 we plan to use the audit information from Electronics Watch in contract review meetings.

Raising awareness through training of both the Procurement Team and other staff has been a core activity in 2018/19 and will continue through 2019/20.

Pro-Chancellor and Chair of Council

22 November 2019