

Modern Slavery Act Statement

2021/22



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 2020/21.

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 £325M, with an international student body of more than 14,000 students from over 120 countries across four Faculties.

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

Modern Slavery and Human Trafficking have remained 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. The University is also part of research consortium with six other universities and Public Health Wales investigating issues relating to Violence, Health and Society. 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 in 2020 introduced a Safeguarding Statement to complement its existing safeguarding framework and has a number of policies in place to support and promote equality of opportunity, diversity and human rights. These include an interim Equality, Diversity and Inclusion Plan that sets out how we apply our policies so that we are a fair and equitable employer. In July 2021, the University adopted a new Strategy and work is now on-going to develop a People and Culture Plan to underpin its implementation and enhance activity in the EDI sphere.

We want all our colleagues to feel confident that they can expose wrongdoing without fear of retaliation. Lancaster University has established a robust complaints and whistleblowing 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.

Understanding our supply chains

We purchase a diverse range of external goods and services in support of our activities and the University is committed to enforcing effective controls to ensure Modern Slavery is not taking place in our supply chains. Protecting Human Rights in the supply chain is specifically referenced in our Procurement Policy and we operate a centralised procurement model to manage our expenditure robustly.

On an annual basis, we carry out an exercise to map the high-risk areas within our Tier 1 supply chain to meet our commitment of better understanding our suppliers and to target our activity where it can have most impact. Our analysis for 2020/2021 was carried out at a more granular level of spend than previous years and highlighted the following areas of our expenditure as higher risk:

- Audio-visual equipment;
- Catering: Fish and seafood, Fruit and vegetables;
- Furniture;
- Uniforms/Clothing;
- Computing: PCs, Laptops, Storage, Peripherals;
- Mobile phones;
- Printer equipment and consumables;
- Laboratory Equipment and Consumables;
- Construction, including materials.

A large proportion of our expenditure in these higher risk areas is under a HE Sector Framework Agreement. These agreements are managed by University purchasing consortia who each have their own anti-slavery policies. Many Framework suppliers have signed up to the Base code of the Ethical Trading Initiative (ETI), a code of good labour practice set out by the International Labour Organisation (ILO). We are affiliate members of Electronics Watch, an organisation that audits manufacturing sites across the world. Guided by workers' rights and priorities, Electronics Watch uses worker-driven monitoring to detect problems in factories.

Due diligence in our processes

As part of our initiative to identify and mitigate risk we operate a centralised procurement model with clear delegated authority. The procurement team are responsible for identifying, monitoring and mitigating areas of potential risk, including the risk of slavery and human trafficking.

To ensure suppliers are aware of our values, tender documents and standard Terms and Conditions include clauses supporting our commitment to protecting human rights in our supply chain. All potential bidders are required to declare their compliance with the Act before their bid is considered. We use an HE Sector wide tool – NETpositives Supplier Engagement – to record supplier sustainability activities, including actions taken by suppliers to identify and eliminate modern slavery in their supply chains.

Training and raising awareness

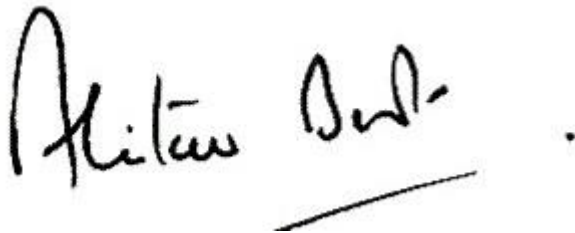
We are part of a national Responsible Procurement Group that exists to address the issues surrounding Responsible Procurement in Higher Education including Modern Slavery, Workers Rights, Sustainable and Ethical Procurement. Our national body, HEPA the Higher Education Procurement Association provides up to date training and resources on Protecting Human Rights in the Supply Chain and this is available to all staff. The course is mandatory for Procurement staff. In addition, we have provided training to over 350 other staff involved in the purchasing process. The Head of Procurement is the named contact point for any member of staff wishing to raise concerns about a supplier.

Effectiveness of the steps we have taken this year and our plans for the future

We have continued to extend our annual mapping exercise of the higher-risk areas within our Tier 1 supply chain and to add Tier 2 information. On award of new contracts, we now ask suppliers to identify risks in their supply chains and record mitigating actions. In 2021/22, we plan to gather more information on the steps key suppliers are taking to mitigate risk in their supply chains.

We continue to play an active role in the management of sector-wide frameworks agreements and to promote them within our institution. These contracts contain specific human rights protection and anti-trafficking obligations on suppliers and leverage the expenditure of the entire sector.

Raising awareness through training of staff involved in purchasing has continued through the pandemic. In 2021/22, we plan to improve our online training offering to make it easier to reach more colleagues.



Pro-Chancellor and Chair of Council

26 November 2021