

# Modern slavery and human trafficking statement 2023/24

## Introduction

1. This statement is made in accordance with 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 2024.
2. 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 2023-24.

## About the University

3. 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 40,000 students, over 10,000 staff and a turnover of £985 million (2022-23).
4. 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 unswerving 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.
5. In 2022, the University set out its [Policy on Responsible Investment](#) explaining the commitment to ensuring the University in its investments adopt high ethical standards and responsible attitudes towards the environment and human rights.

## Our supply chain

### Procurement

6. 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.

7. 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.
8. 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.
9. 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 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.
10. 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 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**

11. 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
12. The University’s Purchasing and Sustainability Services facilitate the delivery of sustainable procurement through the category management process, seeking continuous improvement.
13. 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.
14. 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 often rely on lower paid workers to deliver the service and are sectors where modern forms of slavery may be more likely to occur. The University’s suppliers operating in these industries have been

categorised into thirty-one tiered sub-groups to facilitate a more targeted approach to both sourcing and management.

15. 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.

## Supply Chain Management

16. 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, prioritising high volume items, to improve supply chain transparency and identify any concerns requiring intervention. Electronics Watch use their expertise and resources to undertake these checks and lead interventions within supply chains to ensure best outcomes for those at risk.
17. The University also uses the NETpositive Supplier Engagement Tool which helps suppliers to create and update sustainability commitments including monitoring and addressing Modern Slavery and Human Trafficking risks in their supply chain.

## Employment of staff

18. The University's commitment to securing the rights of our staff is set out in our institutional People and Culture policies and procedures.
19. Key People and Culture 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 \(PDF\)](#) sets out expectations about how everyone should be treated on campus.

## Training

20. 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.
21. We built on this in 2023-2024 by inviting a local Detective Sergeant to our Purchasing forum to deliver a training session on Modern Slavery and Trafficking. The session included an overview of particularly vulnerable groups, definitions as laid out in the Act, types of exploitation, the warning signs, as well as highlighted industries of increased risk.
22. This face-to-face session brought real, tangible examples that were directly relatable to our team's work, highlighting the critical importance of thorough due diligence in procurement. It illustrated the risks and vulnerabilities specific to the supply chains we

engage with and emphasised the practical steps we can take to mitigate those risks. The training also reinforced the significance of understanding and utilising reporting and whistleblowing procedures, ensuring that our team is equipped to act swiftly and effectively if any concerns arise.

23. To further enhance our understanding of modern slavery and human trafficking risks, all category team members are either working towards, or are 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

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

- Continue to engage with suppliers in high-risk categories to ensure they are aware of and committed to the Modern Slavery Act's requirements.
- Improve engagement and tracking of progress against supplier sustainable action plans, with particular focus on labour rights and managing the risk of modern slavery.
- 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.
- Deliver ongoing training and awareness programs for the procurement team and Contract Managers
- Review and update the Whistleblowing policy and continue to promote this as a means for employees and stakeholders to report concerns related to modern slavery or human trafficking.
- Investigate the need for an internal policy addressing University stakeholder responsibilities and reporting mechanisms.



Alastair Da Costa  
Chair of Council  
28 November 2024