



London Universities Purchasing Consortium Modern Slavery and Human Trafficking Statement

Year Ten: A Review of August 2023 to July 2024

1. INTRODUCTION

London Universities Purchasing Consortium (LUPC) is a non-profit organisation whose purpose is to provide professional procurement services to our members, delivering value for money, innovation, and sustainability.

We are one of six regional higher education purchasing consortia in the UK working collaboratively alongside two specialist sector purchasing organisations and are known collectively as UK Universities Purchasing Consortia (UKUPC). Together we tender and manage more than 100 framework agreements compliant with public contracts regulations for our members to use.

Established in 1968, LUPC's membership comprises universities and colleges of higher and further education, as well as other not-for-profit organisations in the arts, science, charity, and wider public sectors. Our small team is based at its Fitzrovia office location and works alongside procurement professionals and other experts from our membership base.

LUPC remains committed to supporting international human and labour rights standards, the [UN Guiding Principles on Business and Human Rights \(UNGPs\)](#) and the [UK Government's National Action Plan](#) to implement the UNGPs.

This statement is designed to satisfy the requirements of Section 54 of the [Modern Slavery Act 2015 \(MSA\)](#), by informing members, staff, and public stakeholders about LUPC policies and approach to identifying, preventing and mitigating Modern Slavery, human trafficking, forced and bonded labour and human and labour rights violations in its supply chains.

As a public organisation, LUPC is not yet covered by the requirements of the UK MSA – although it is acknowledged that the UK Government has committed to changing this. Additionally, LUPC's turnover is below the threshold for businesses required to publish a statement. However, LUPC's Board considers that total member spend, approximately £279m in this reporting period, through our framework agreements warrants a statement on the Modern Slavery and human trafficking risks inherent in its supply chains and the steps LUPC is taking to address these. It is also consistent with our strategic objective to be a leader in responsible procurement.

After describing the organisational structure of LUPC, this statement sets out LUPC's approach in addressing modern slavery and human trafficking, actions taken in our 2023-2024 financial year and finally our goals for 2024-25.

2. ORGANISATIONAL OVERVIEW

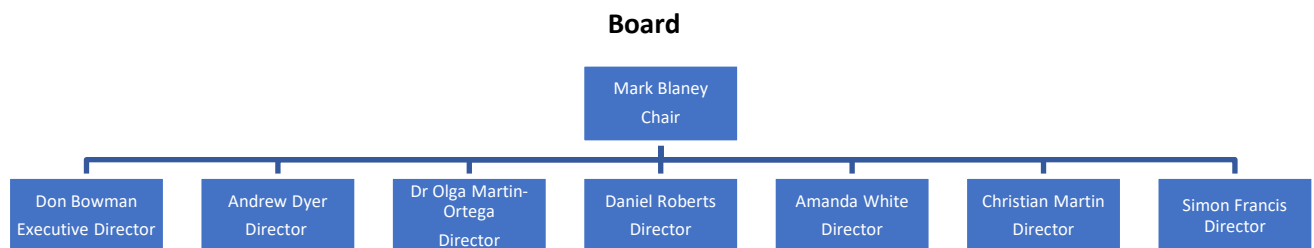
2.1 Structure

LUPC's Articles of Association set out its constitution, responsibilities of its directors and the kind of business undertaken. They also define the contract between LUPC and its members.

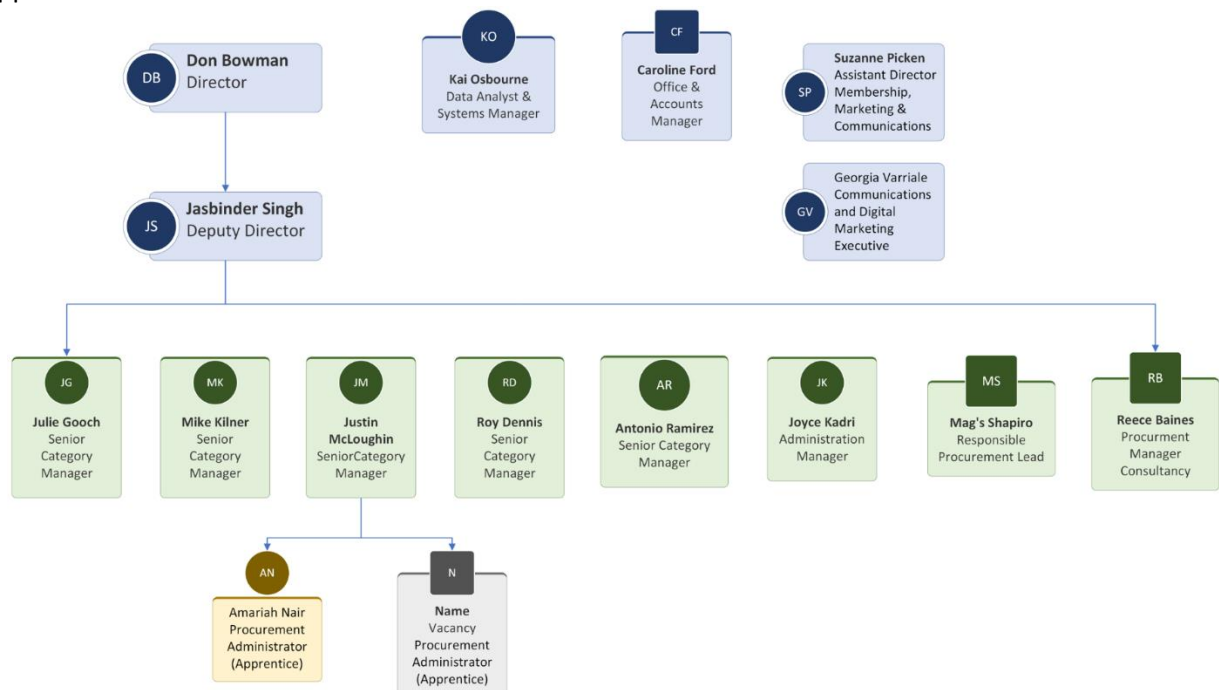
As a company limited by guarantee, LUPC is led by a Board made up of senior directors drawn from members of the consortium. The Membership democratically elects all Board Members, with just one exception – LUPC's Director, who is accountable to the Board.

The Board is responsible for the strategic leadership and direction of the consortium. It elects the Chair and Deputy Chair, appoints the Director, sets the budget, publishes its Annual Report, Accounts, and executes all other duties and responsibilities commensurate with directing the company.

The Board meets four times annually and delegates day-to-day management responsibility to the Director and decisions as to operational priorities to LUPC's Executive Committee.



The **LUPC team** includes 13 permanent, full-time employees, one part-time employee and two apprentices.



2.2 Roles and responsibilities

Senior Category Managers tender framework agreements, appoint suppliers and conduct contract management for the lifespan of a framework agreement. Operational management of Senior Category Managers is undertaken by the Deputy Director with responsible procurement support (including Modern Slavery and Human Trafficking) from the Responsible Procurement Lead, who is also supported part-time by a PhD student. Each role within the organisation contributes to addressing Modern Slavery and Human Trafficking. This includes the data and reporting support provided by the Data Analyst, and marketing and communications by the Marcomms team, who report to the Director. The Director's role includes overall responsibility for policy, strategy, reporting, and external stakeholder engagement.

2.3 Our Supply Chain

Our own direct supply chain is small and dedicated largely to provision of services related to running our office (rent, utilities, stationery, IT support, accounting services) and occasional business travel, with around 10 regular suppliers, who are all locally based in the United Kingdom.

2.4 Framework Agreement Supply Chains

It is the supply chains of the framework agreement suppliers where we have greatest leverage in terms of addressing Modern Slavery, due to the amount of spend, impact on our members and complexity of supply chains in some cases. Framework agreements fall within the following Categories:

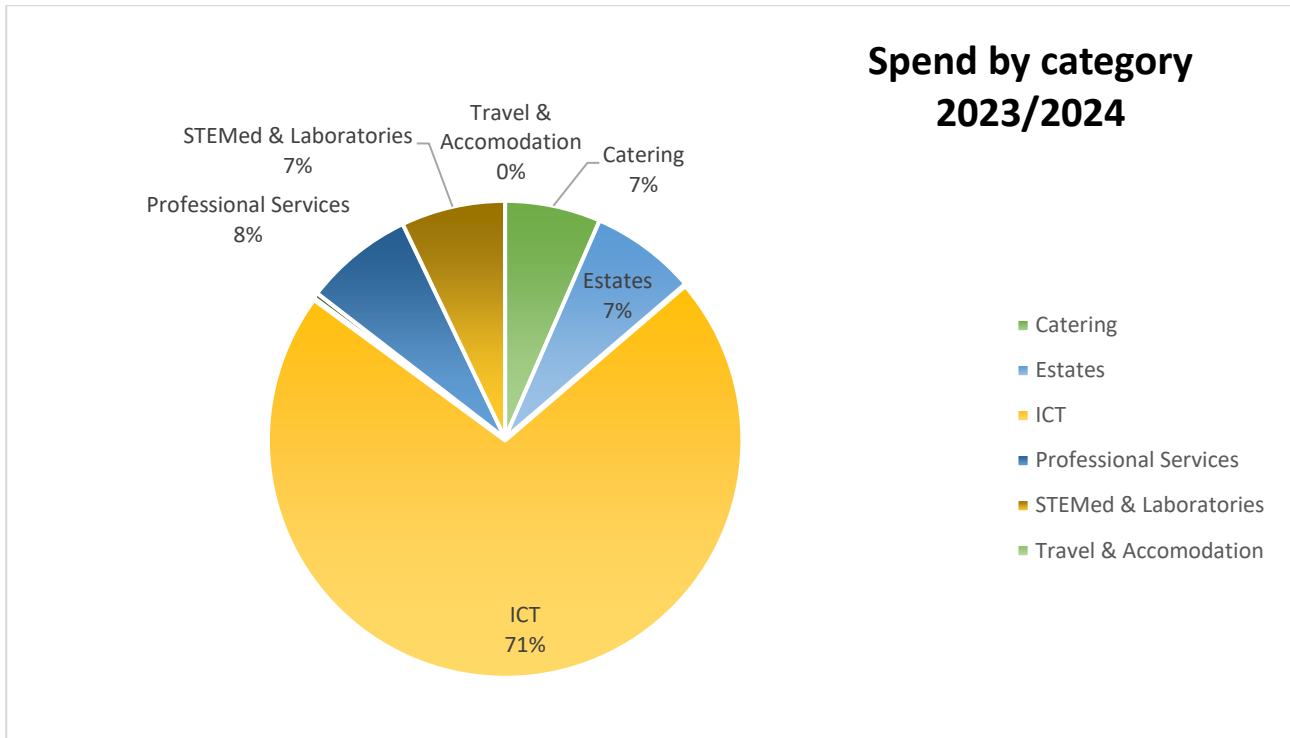
Estates	Professional Services	Labs & Libraries	ICT
Catering Outsourced Services	Legal Services	Laboratory equipment	eProcurement System
Cleaning Services*	Graduation and Ceremonial Gowns, Photography and Events Services		Desktop & Notebook (NDNA)
Estates & Facilities Management	Debt Recovery		Mobile Phones - ethically sourced
Maintenance & Minor Works*	Occupational Health		
Sustainable Waste Management Services	Insurance Brokerage Services		
	Carbon Offsetting Validation Services		
	Travel: taxis*		

*Expired frameworks, but still with call off

Current LUPC Framework Agreements cover contracts with just under 120 suppliers.

Spend by UKUPC members against LUPC framework agreements this reporting period is as follows:





While the spend is not that of LUPC itself, responsibility for design and management of the framework agreements creates leverage over the supply chain and a level of responsibility for human rights due diligence.

3. APPROACH TO ADDRESSING MODERN SLAVERY AND HUMAN TRAFFICKING

3.1 Policies, Recognition and Commitments

The LUPC [Strategy 2021-2024](#) 'Working together to achieve shared goals in a changing world' details how the organisation will continue to enhance its position as a leader in responsible procurement, by *inter alia*, implementing effective supplier due diligence, investigating opportunities for collaboration, providing 1:1 support to members, and supporting members in their efforts for supply chain transparency. The new LUPC strategy for 2024-2028 comes into effect outside of this reporting period.

Our work on combatting Modern Slavery has been recognised as both innovative and public sector leading.¹ We have worked with our members, other HE consortia, research institutes, the wider UK public sector and international organisations in delivering projects and conducting research, building, and producing resources on preventing Modern Slavery and human trafficking. LUPC's [Responsible Procurement Strategic Plan](#), published in June 2022, is due to be updated in line with the LUPC Strategic Plan 2024 - 2028. Building on the organisation's maturity in responsible procurement, the strategy will focus on deeper supplier development and engagement, which includes Modern Slavery.

In alignment with other consortia who make up UKUPC, LUPC undertakes to ensure all framework agreement suppliers sign a commitment to the [SUSTAIN Supply Chain Code of Conduct](#), which outlines expectation in terms of governance, economic, environmental and social practices, including Modern Slavery.

¹ ActionSustainability ISO20400:2017 Assessment Report 2023



3.2 Human Rights Due Diligence: Risk Assessment and Management

LUPC looks to sector, as well as location, when assessing supply chain risk for Modern Slavery. Using the Higher Education Procurement Association (HEPA) Commodity Risk Analysis Tool for sector input and our own research into origin of goods and location of suppliers for services, we continue to update our risk maps and adjust due diligence efforts accordingly.

Due to the nature of the work, wage and skill levels, use of agencies and sub-contractors, as well as geographies, LUPC categories of highest risk for Modern Slavery are identified as:

Estates	Professional Services	Labs & Libraries	ICT
Catering Outsourced Services		Laboratory equipment	
Cleaning Services	Graduation and Ceremonial Gowns, Photography and Events Services		Desktop & Notebook (NDNA)
Maintenance & Minor Works			
Sustainable Waste Management Services			

Actions to manage risks depending on the risk level identified. LUPC believes in long-term engagement with its framework suppliers, on the issues of modern slavery and human trafficking, and wider human and labour rights in global supply chains. Therefore, it integrates requirements on these topics throughout the procurement process, from initial evaluation via the Supplier Questionnaire (SQ), to tender drafting and evaluation, and during contract management.

Actions to manage this risk include prioritising the roll out of the government's Modern Slavery Assessment Tool (MSAT) to suppliers on the above identified higher-risk framework agreements.

Steps towards risk identification and management include affiliations with both Electronics Watch, for global worker-led monitoring in ICT and Unseen who run the UK Modern Slavery Helpline.

LUPC is a founding member of Electronics Watch, an organisation that aims to protect the labour rights and safety of workers in global electronics supply chains supplying the public sector. Since 2017, LUPC has paid for all full Members to be Electronics Watch affiliates; providing guidance, resources and contract clauses that support responsible procurement. Electronics Watch continues to connect public sector buyers with workers' rights experts, who conduct worker-driven monitoring across Information and Communication Technology (ICT) supply chains, driving compliance and improving working conditions. This involves engaging with resellers, manufacturers, the industry, and other stakeholders to follow up on contract conditions. LUPC provides Electronicswatch with framework agreement supplier details, products included in framework agreements and continuous work is undertaken to obtain and share tier 2 supplier details. LUPC and all full members receive monthly monitoring reports, with indication of when it is appropriate to act or not.

Due diligence is conducted across categories throughout the tender process, including an initial evaluation via the Supplier Questionnaire (SQ) in line with Procurement Policy Note (PPN) 03/23; the Invitation to Tender (ITT) and during contract management via LUPC's Supplier Due Diligence Tool (SDDT).



The SDDT is a questionnaire completed by framework suppliers, which includes confirmation of policies and practices in place and submission of evidence. After evaluation, a custom report is prepared for each supplier providing proposed corrective actions as well as useful references to support improvements. The objective is to measure supplier progress and to guide design of supplier development programmes. Our overarching aim is to use our leverage to stimulate a responsible procurement movement, where suppliers reach higher and further with our support.

Key areas reviewed are:

Environmental Decarbonisation	Social Human Rights & Modern Slavery Diversity, Equality & Inclusion Social Value Real Living Wage Freedom of Association & Employee Voice Health & Safety	Governance Anti-bribery & Corruption
Supply Chain Monitoring		
Sustainability Strategy, Reporting & Accreditations		

In the SDDT, LUPC does not focus on Modern Slavery and Human Trafficking alone, but on broader human and labour rights issues. This is to recognise that situations of extreme exploitation are often brought about by the violation of multiple human and labour rights – and that therefore a comprehensive approach is needed to ensure that they do not escalate. Suppliers are asked to outline their approach to identifying human and labour rights risks overall, as well as any actions in place to manage them and remedy abuses identified. Additionally, studies have demonstrated that providing workers with a living wage has an influence on ensuring decent work and preventing modern slavery and human trafficking. LUPC continue to be an accredited member of the Living Wage Foundation, completing an annual confirmation of LUPC salaries aligned to the Living Wage rate. Through our SDDT exercise, we ask suppliers to indicate whether they are accredited by the Living Wage Foundation and encourage those who are not yet members to join as part of corrective actions proposed.

See below Section 4 for details of how LUPC has engaged with suppliers on the MSAT and through its SDDT in the reporting year and Section 6 for plans for the next period.

LUPC is open to receiving complaints on human and labour rights abuse in any of the framework agreement supply chains. Media is also scanned for reporting of any abuses and Electronicswatch provides a channel for the ICT framework agreements.

3.4 Training, Engagement and Collaboration

LUPC collaborates and shares learnings around Modern Slavery via membership, affiliation, and joint initiatives with:

- [UKUPC](#)
- [The Business, Human Rights and Environment Research Group \(BHRE\)](#), University of Greenwich
- [Electronics Watch](#)
- [Unseen](#)
- [Higher Education Procurement Association \(HEPA\)](#)
- London Responsible Procurement Network
- International Working Group on Ethical Public Procurement (IWGEPP)
- Action Sustainability's Supply Chain Sustainability School
- NHS Commercial Services



We also share learnings informally with:

- Canadian Inter-University Working Group on Sustainable Procurement
- Australasian Universities Procurement Network

We are a member of the Global Electronics Council Technical Committee on Corporate ESG Performance, and we continue to give our input as public sector buyers on the Responsible Supply Chains Criteria document.

Modern Slavery resources on our website include a free Modern Slavery e-Learning course. Updates regarding Modern Slavery appear regularly in our quarterly e-zine, Linked.

4. REPORT ON 2022 – 2023 GOALS

4.1 CIPS Ethics Mark

We have been awarded the Chartered Institute of Procurement & Supply (CIPS) Corporate Ethics Mark for the fourth consecutive year. Organisations displaying the mark have signed a Statement of Commitment to ethical sourcing and supplier management and have taken pro-active steps to safeguard against unethical conduct. The Mark is a way for CIPS to recognise an organisation that commits to ethical procurement through a publicly accessible register.

4.2 Supplier Due Diligence Tool

With our commitment last year to making completion of the SDDT a mandatory requirement for all framework suppliers as part of supplier induction and annually thereafter, our focus for this reporting period has been the development of an online portal called the RP Hub. The first phase of development includes housing of the SDDT, with automated scoring of answers to multiple-choice type questions and manual evaluation of the remaining open-ended questions and collection of Sustainability KPIs. Open-ended questions are Human & Labour Rights-focussed, asking framework agreement suppliers to share top Human & Labour Rights risks they have identified in their supply chain, describe their process for identification, management and remediation of risks. During this process, the SDDT was updated to Version 4.

Suppliers are asked to upload evidence of their Modern Slavery Statements and scores for MSAT.

We have updated the Responsible Procurement page of LUPC's website with a new section outlining our approach to [supply chain due diligence](#).

4.3 MSAT

In 2022, LUPC required suppliers on the Estates framework to complete the MSAT. We provided feedback on the tool based on our experience with the Estates framework suppliers and our own completion of MSAT for our organisation and use of the report generated. Unfortunately roll out has been hampered by the Cabinet Office's MSAT platform and we remain in contact to ascertain when improvements will be made. In the meantime, suppliers indicate whether they have completed MSAT as part of answering the SDDT.

4.4 Policy and Grievance mechanisms

A key recommendation arising from our ISO20400: 2017 assessment in 2023, was the establishment of a grievance mechanism for suppliers to mitigate negative impacts in supply chains, providing access to remedy for affected stakeholders. While we continue to work with Electronicswatch in our category of greatest spend, developing a more formalised system of gathering and responding to complaints in other sectors has been a key part of our activity this year and following the tier 1 mapping exercise has



led to our affiliation with Unseen and development of our [Human & Labour Rights Policy](#). This policy details our approach to supply chain risk mapping, due diligence, grievance system, access to facilitation of investigation and worker- and community- driven remedy as appropriate. On the [Responsible Procurement page of LUPC's website](#) we have uploaded our [Human & Labour Rights Policy](#), which acknowledges our responsibility to respect human rights, including avoiding infringements on the rights of others and addressing adverse human rights impacts where these might occur, in line with the UN Guiding Principles on Business & Human Rights. We have also provided a [button linking to the UK Modern Slavery Helpline](#) which includes a webform and the helpline telephone number for reporting concerns about a potential instance of modern slavery. This is a confidential and independent service operated by Unseen UK, providing advice and guidance to anyone concerned about modern slavery.

4.5 Modern Slavery in Tenders

The Responsible Procurement Lead, together with our PhD student, supported category managers at LUPC and other consortia in tender processes of frameworks for Debt Recovery, eProcurement and IT-related Accessories and Parts. Depending on risk, tender documents include tailored questions on how suppliers manage their human and labour rights impacts in their supply chains.

4.6 Supply Chain Mapping

We have mapped all LUPC framework agreement suppliers to Tier 1. All but one supplier are located in the UK. The RP Hub will house Tier 2 information as a separate exercise to the completion of the SDDT.

For the ICT Category, ongoing supply chain mapping processes that have been in place for some years have improved traceability down to component suppliers. The LUPC Senior Category Manager works with framework agreement suppliers, brands and Electronicswatch on this particular mapping exercise, which enables worker-centred monitoring and remediation across the globe. For further details please see the highlights from Electronicswatch affiliation below.

4.7 Student engagement and research on Modern Slavery

During the reporting period, the findings were published of research conducted by the Universities of Surrey, Bath, and the West of England, titled "Intersecting sustainabilities: Protecting both people and planet in supply chains". The project was funded by the Modern Slavery and Human Rights Policy and Evidence Centre (Modern Slavery PEC). The research included working with people with lived experience of Modern Slavery, facilitated by Unseen, and interviewed LUPC members and suppliers.

Recommendations from the published report included:

"Recommendation: Public buyers which are members of purchasing consortia should better assure against modern slavery risk by ensuring their consortia adopt a robust supplier assurance and contract management programme, similar to the Supplier Due Diligence Tool (SDDT) used by LUPC. This delivers an enhanced level of assurance for suppliers in their frameworks and supports suppliers in their responsible sourcing activities, including giving feedback and an improvements plan to work towards." (Rogerson et al, 2024)

We are proud of our Responsible Procurement Advisor, completing her PhD in the Business, Human Rights and Environment (BHRE) Research Group at the University of Greenwich, partly sponsored by LUPC taking up full time employment at the Greater London Authority (GLA) as a Responsible Procurement Manager.

PhD students regularly request interviews around research into Modern Slavery in the public sector, to which we more than willingly oblige.

LUPC's due diligence approach has been included in a case study for a chapter entitled "Public procurement ethics: a human rights lens to public procurement" in an academic textbook "Teaching Public Procurement: Bridging Theory and Practice" to be published by Routledge in the next reporting period.



4.8 Modern Slavery member support

Our Responsible Procurement Lead is available to members for guidance and support with their Modern Slavery Statements.

4.9 London Living Wage Foundation

LUPC continue to be an accredited member of the Living Wage Foundation, completing an annual confirmation of LUPC salaries aligned to the Living Wage rate. Through our SDDT exercise, we ask suppliers to indicate whether they are accredited by the Living Wage Foundation and encourage those who are not yet members to join as part of corrective actions proposed.

4.10 Investigating claims

No claims were received in the reporting period.

Highlights of **Electronics Watch** activity across the year include publishing of a guiding framework “Principles of Worker-Driven Remedy” for public sector buyers and other stakeholders in support of addressing harm to workers through inclusion of workers in all phases of remedy. Electronics Watch’s [Worker-Driven Monitoring Methodology](#) involves talking to workers outside their workplaces, collecting information and leading actions with industry leverage and returning to workers at all phases of remedy to ask if they agree.

Work in Malaysia focused on migrant workers and women around recruitment fees. In Taiwan, local partners trained vulnerable groups on remedy principles and freedom of association, with one group organising themselves and negotiating a collective agreement. In Central Europe, a focus on health and safety and supporting trade unions and in Vietnam an app has been launched to address the challenge of direct communication with workers. In India, lack of payment of annual bonuses due was remedied. More deliberate and regular dialogue with trade unions was established together with monitoring partners in Hungary, India, Indonesia, Malaysia, and the Philippines.

LUPC continues to play an active role and in conjunction with Electronics Watch, assists with linking PC device sales made through the *National Desktop and Notebook Agreement (NDNA)* to member-specific monitoring and remediation activities undertaken through the quarterly Monitoring Status Reports issued to each affiliate. This work includes the ongoing updating of the supplier-completed *Factory Disclosure Forms* and regular questioning as part of the responsible procurement standing item on the NDNA review meeting agenda.

In this reporting period, LUPC was able to provide Electronicswatch with factory information for:

- 194 component suppliers and 14 final assembly suppliers
- 13 countries (Brazil, China, Czech Republic, India, Japan, Korea, Malaysia, Philippines, Poland, Singapore, Taiwan, Thailand, Vietnam)
- 19 product models

5. MODERN SLAVERY-RELATED KPIS: AUGUST 2023 – JULY 2024

We set a number of Modern Slavery-related KPIs in our statement last year, which have not been measured, as our focus shifted to the creation of the online RP Hub and improvement of the SDDT, to enable sustainable, long-term roll out across all LUPC managed framework agreements, without adding to cost to members or suppliers. The system supports meaningful engagement with suppliers, embedding ongoing due diligence into contract management, supplier development and transparency for members. The lack of development with the MSAT tool has hampered our intention to roll out to higher risk framework suppliers. We were, however, able to significantly overshoot our target for supply chain mapping.



	2023/2024 Actual	2023/2024 Target	Cumulative Actual	Cumulative Target
Number of framework agreements where SDDT has been rolled out	0	4	4	6
Number of suppliers on active framework agreements who have completed the SDDT	0	36	34	70
Percentage of total suppliers who have completed the SDDT	22%	New KPI 2023/24	n/a	n/a
SDDT completion rate (completed questionnaires/number of requests to complete)	n/a	90%	n/a	85%
Percentage of suppliers who have completed the SDDT, who have responded with a Corrective Action Plan (CAP)	5%	New KPI 2023/24	n/a	n/a
Number of Modern Slavery-related improvements attributed to the SDDT	n/a	New KPI 2023/24	n/a	n/a
Framework agreements with Tier 1 mapped	9	2	11	8
Framework agreements with Tier 1 & 2 mapped	1	1	1	5
Framework agreements with updated Modern Slavery risk maps	1	1	1	5
Number of suppliers who have completed the MSAT	n/a	11	n/a	30
Percentage of total suppliers who have completed the MSAT	10%	New KPI 2023/24	n/a	n/a
Number of complaints of Modern Slavery received	0	n/a	0	n/a
Percentage of complaints of Modern Slavery resolved	n/a	New KPI 2023/24	n/a	n/a

6. 2024 – 2025 GOALS

6.1 SDDT

Now using the part-automated system housed in the RP Hub, we can rollout the SDDT to all framework agreement suppliers at supplier induction stage and annually thereafter. The process will include agreed Corrective Action Plans (CAPs) and publishing of supplier reports, once agreed with suppliers, so that members can track progress.

6.2 MSAT

We will continue to engage with the Cabinet Office around improvements to the MSAT and will include high level scores from MSAT in the SDDT.

6.3 Addressing Modern Slavery in Contract Management

The Responsible Procurement Lead will continue to expand support to Senior Category Managers during contract management meetings.

6.4 Update of risk register

We will continue to work in collaboration with the UKUPC Responsible Procurement Network and HEPA to update the risk register. We have specifically undertaken to support on the Working Conditions theme.

6.5 Tier 1 & Tier 2 supply chain maps

We will continue to build on risk mapping efforts and document responsible procurement risk maps for framework agreements, including Modern Slavery.



6.6 Supplier Responsible Procurement Portal

The RP Hub will be launched and reported on in the next reporting period.

6.7 Use of UK Modern Slavery Helpline

We will host webinars and share resources with members and suppliers to promote the use of the UK Modern Slavery helpline.

MODERN SLAVERY-RELATED KPIS: TARGETS AUGUST 2024 – AUGUST 2025

	2024/2025 Target	Cumulative Target
Number of framework agreements where SDDT has been rolled out	6	11
Number of suppliers on active framework agreements who have completed the SDDT	35	90
Percentage of total suppliers who have completed the SDDT	80%	n/a
SDDT completion rate % (completed questionnaires/number of requests to complete)	60%	n/a
Percentage of suppliers who have completed the SDDT, who have responded with a Corrective Action Plan (CAP)	25%	n/a
Number of Modern Slavery-related improvements attributed to the SDDT	New KPI 2024/25	
Framework agreements with Tier 1 mapped	11	11
Percentage mapped	100%	
Framework agreements with Tier 1 & 2 mapped	1	2
Percentage mapped	18%	
Framework agreements with updated Modern Slavery risk mapped	11	11
Number of complaints of Modern Slavery received	0	0
Percentage of complaints of Modern Slavery resolved	New KPI 2024/25	

To see all previous LUPC statements, visit this [link](#).

This statement has been approved by LUPC Board on 6 December 2024 and will continue to be reviewed annually.



13 December 2024

