



UKUPC

UK Universities Purchasing Consortia

Introduction

This guide has been developed by the UKUPC Responsible Procurement Network. The Network is made up of procurement professional representatives from each of the UK higher education purchasing consortia and the knowledge contained here is based on their experience of working with a wide range of suppliers on this topic.

The guide is intended to be used by any supplier who would like information on developing their own Modern Slavery and Human Trafficking Act statement. It does not constitute legal advice.

If you would like more information or to provide your thoughts on the content, please contact the Chair of the Responsible Procurement Network, [Jayne Thorn](#), Head of Category Management Services, SUPC.

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What is modern slavery and human trafficking?

Modern Slavery comes in many guises, it affects men, women and children of all ages, races, and religions. Slavery and servitude are the use of forced or compulsory labour. Human Trafficking is the arrangement or facilitation of travel for a person, with the view of that person being exploited. Exploitation includes sexual exploitation, removal of organs, securing services from children or vulnerable people with threats, force, or deception. It involves the use of force, coercion, and the abuse of vulnerability.

How and why does it exist?

Modern Slavery and Human Trafficking exists where profits or income can be increased by reducing the costs of goods and services. It can happen to anyone however it most commonly occurs in communities where people are vulnerable, where laws are weaker or less likely to be enforced, or where corruption is commonplace. It can happen to groups of people who are not protected by law, such as illegal migrants, those without documentation, or those who can be blackmailed with threats of deportation. No country is immune from slavery and it is estimated that there are tens of thousands of slaves in the UK.

Why is corporate social responsibility and responsible procurement important, especially in higher education?

As a global society, we must do more to protect those weaker and less fortunate than ourselves. No person deserves to suffer so that we can buy goods and services at competitive prices, or enable huge profit margins to those manufacturing, selling, or moving those goods.

Modern slavery and human trafficking have always been high profile issues of importance for the higher education sector in the UK; the sector is one of the most prestigious in the world, and as such undergoes the highest level of scrutiny by not only the global public, but also the students attending these institutions. With world class teaching and learning, universities exist to make the world a better place, and are therefore uniquely placed to improve the world around us.

Spending money with a social and ethical conscience, supporting SME's, focussing on renewable energy, and ensuring the goods and services they are procuring are free from modern slavery and human trafficking are just some of the aspects university procurement teams focus on.

Why having a modern slavery statement is not enough.

A statement simply details what you have done, and what you are planning on doing, the activity is the really important bit. There is a list of mandatory requirements for a statement to be compliant, but it should not be a box ticking exercise. It should be a clear record of achievements and goals in the stated time periods. It is ok for your first statement to record that you have not done anything if that is a fact, the statement must be credible and

reflect the actual status of your organisation. Having a good statement shows what you as a business are intending to do in the next financial year to tackle modern slavery and human trafficking in your own organisation and in your supply chain.

Which businesses need a modern slavery statement?

Businesses with a turnover of more £36m annually are required by law to produce a Modern Slavery and Human Trafficking statement each financial year.

This does not mean that if your turnover as an organisation is below this threshold it does not matter. It is everyone's duty to ensure that workers in our organisations and throughout our supply chains are not being exploited. Many organisations who turnover a much lower value produce a statement voluntarily and many buying organisations including those represented by UKUPC, are now moving towards routinely asking suppliers to develop documents.

What are the mandatory requirements?

If the organisation has a website, it should publish the statement on its website and include a link to that statement from a prominent position on the organisations home page. The visibility of this statement is paramount in demonstrating transparency and organisational willingness to publicly commit to addressing issues surrounding modern slavery and human trafficking.

The statement must be approved and signed at the very highest level of the organisation, such as a director or equivalent.

Showing commitment from the most senior personnel in an organisation demonstrates ownership of the issue and proactive involvement in tackling modern slavery and human trafficking in the organisations' supply chains.

The statement must be signed within 6 months of the end of the financial year outlining what action was taken and identifying those who take responsibility for the supply chain and those who work in it.

What should we be including in our Modern Slavery Statement?

Government have issued [guidance on this topic](#). In this document we draw on that guidance, and aim to simplify that for you, suppliers to our business. Within the Government guidance there is a section on the structure; at the moment, this is voluntary however it has been indicated that in the future, the structure may be mandatory, we therefore align this guide to that.

Your statement should be written in plain, simple, and succinct English, you may also want to publish it in other languages depending on where your supply chain is based.

A statement should aim to include information about:

a) The organisation's structure, its business, and its supply chains:

- The sector in which it operates and if any of the work is seasonal.
- The organisation structure and group relationships
- The countries it sources from including high risk countries where slavery is prevalent.
- The make-up and complexity of the supply chains
- Relationships with other bodies such as trade unions and bodies representing workers.

What does a good example look like?

- It fully outlines the company structure.
- It recognises high risk countries and parts of the supply chain and does not shy away from this.

What does a poor/basic/minimal example look like?

- Avoids obvious risks, denies any wrongdoing, blames transfers to other high-risk sectors or countries.
- Does not understand or have awareness of its own supply chains.
- Makes statements without any grounding.
- Transfers responsibility to other parties

b) Your Policies in relation to slavery and human trafficking

If you have them, you should include reference to all relevant policies on the topic:

- Clear policies demonstrate an organisations commitment to this issue.
- Policies ensure appropriate and coordinated action is taken throughout the business.
- It might not require a new and/or standalone policy – it could adapt, add, or clarify other systems or policies already in place.
- The policies should be supported at the highest level in the organisations to ensure buy in throughout the rest of the organisation.

What does a good example look like?

- Policies should have effective communication through the organisation, they should be cascaded with training and resourcing by skilled and knowledgeable individuals.

What does a poor/basic/minimal example look like?

- Makes note of a policy in place, but no mention of when it was last updated, refreshed, or when staff were last refreshed or reminded. Is it available to new starters?
- The policy is managed by someone in the organisations with insufficient skill, knowledge, or authority to get the appropriate level of influence with the organisation to affect real change.

c) Your due diligence processes, risk assessment and response activity.

The statement should highlight the areas where risks are highest and describe what work is scheduled for the next financial year to improve on what has been achieved so far.

The statement should also clearly outline any work that has been undertaken in the past 12 months in preventing or removing modern slavery from the organisations supply chains. This means recording what steps have been taken, be it audits, new terms and conditions with suppliers, changes in the supply base, or updated policies for its own employees.

It does not mean that you have to guarantee that your supply chains are slavery free, it means you have to show what steps you have taken to identify the risks in your supply chain and the action you have taken to minimise or mitigate those risks.

It could also include information on what the intended steps for the financial year were, how they were or were not achieved, and if not, why not. It may be that some actions are carried over.

It may also accept that a situation arose, such as COVID, that prevented some actions being undertaken such as factory audits, and how this inaction was mitigated. It may also mean that other unplanned actions were undertaken, and these should be outlined to show what was achieved and how the organisation reacted to

What a good example looks like:

- It fully outlines what action has been taken.
- It should detail what work has been undertaken to identify high risk areas in the supply chain and addresses those risks.
- It outlines any organisations you work with that monitor or prevent human rights abuses.
- It will reference any new or updated documentation that addresses human rights abuses in your supply chains.
- It will describe the training or refresher training that has been made available to the organisation's own workers.
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What does a poor/basic/minimal example look like?

- It shows no progress from the previous year, outlines what is already in place or makes no plans to improve on the work already done.
- It denies the risks that exist and focuses on 'rights to work in the UK'.
- It may ignore an area of risk that has previously been identified as high risk or may fail to address the highest risk areas.
- It does not address or is vague about the training that been undertaken.
- Does not make any mention of compensation or remediation if slavery is found within their supply chains.
- It puts onus onto the supply chain via 'terms and conditions' and suggests terminating relationships with problem suppliers will solve the problem.

d) Your organisations effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.

KPIs should be carefully selected to ensure that they do not inadvertently increase the risk of modern slavery in the supply chain. For example, specific focus on reducing cost or delivery timescales to an unrealistic extent, may increase pressures elsewhere in the chain and actually cause a supplier to deal with these by using modern slavery.

What a good example looks like:

- You could detail your current KPIs and state how they make your business and supply chain vulnerable to modern slavery.
- You could include information on any KPIs you have introduced to measure the performance of anti-slavery actions undertaken.
- You could set targets for training and understanding of modern slavery, risks, spotting the signs and reporting.
- You could set targets for working with suppliers in high risk areas to highlight and/or reduce the risk in their supply chains.

What does a poor/basic/minimal example look like?

- It provides no detail on how you will measure success in your activity.
- It provides no detail on how you will work with your supply chain to identify risk and set appropriate actions.
- It provides no detail on how you will work with your staff to highlight the importance of the topic.

e) The training and capacity building about slavery and human trafficking available to your staff.

The provision of appropriate and effective training in your own organisation is key to highlighting the risk and prevalence of modern slavery. Ensuring staff have a good understanding the risk factors and how to identify the signs hugely reduces the opportunity for modern slavery to take place.

What a good example looks like:

- It could outline what training will be delivered, and to whom e.g., standard training for new starters, refresher training for existing workers covering modern slavery, workers' rights and ethical standards.
- It could detail how the training will be customised for areas where identification of risk may be higher for example HR or factory workers.
- It might detail the training specifically for those in procurement roles to help them use specific phrases or documentation in their purchasing activity to encourage best practice.
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What does a poor/basic/minimal example look like?

- No reference to training or development for staff.
- No understanding of need for raising awareness.
- No plans for future events or opportunities to educate staff or wider stakeholders.
- Basic training mentioned which is the same for everyone in an organisation despite their role or responsibility.

Final Points

If your organisation has published a modern slavery statement, you can use the new [Government statement registry](#) service to demonstrate your commitment.

The registry is a repository for all modern slavery statements published by businesses in the UK. It also serves as a useful reference point for those wanting to understand how other organisations write their statements.

Lastly, given the incredibly important subject that this legislation covers, we understand the Government are working towards making the requirements more robust; this will likely include, as above, mandatory sections and set submission dates. We will update this document with any changes required as and when they are announced.