

## **Anti-slavery and Human Trafficking Statement November 2016**

### **1. Introduction**

1.1 This statement is made under the Modern Slavery Act 2015 and sets out the steps that London South Bank University (LSBU) is taking with the aim that slavery and human trafficking are not taking place within its supply chain or its business.

1.2 LSBU is a UK higher education institution. LSBU purchases around £60 million p.a. in goods, services and works through various supply chain arrangements.

### **2. Policy on slavery and human trafficking**

2.1 LSBU is committed to procuring goods and services and employing people without causing harm to others. In doing so, LSBU is committed to supporting the UK Government's approach to implementing the UN Guiding Principles on Business and Human Rights.

2.2 In implementing this approach LSBU supports the Base Code of the Ethical Trading Initiative (ETI):

- employment is freely chosen
- freedom of association and the right to collective bargaining are respected
- working conditions are safe and hygienic
- child labour shall not be used
- living wages are paid
- working hours are not excessive
- no discrimination is practised
- regular employment is provided
- no harsh or inhumane treatment is allowed

### **3. Identified risks and mitigation**

3.1 Direct employment – LSBU mitigates the risk of modern slavery in directly employed staff by following its own policies on selection and recruitment.

3.2 Agency staff – agency staff are recruited through established sources, which should provide assurance that they comply with the requirements of

legislation relating to the rights and welfare of their candidates and employees.

3.3 Students – although the risk is low, LSBU recognises that students living in south London and the surrounding area may become aware of instances of modern slavery or human trafficking. If such circumstances occur, students will be encouraged to seek assistance, support and advice on their wellbeing from the Student Life Centre.

3.4 Supply chain – LSBU's supply chains are managed under the following categories:

- estates\* (including capital estate projects, works, maintenance, utilities)
- facilities\* (including cleaning, security, reception, catering, furniture, health & safety including personal protective equipment)
- insurance
- capital & specialist equipment
- professional clothing\*
- ICT hardware\* & software (including audio visual, telecoms, print)
- professional services (including recruitment, marketing, and HR services)
- research & enterprise
- publications
- travel
- office supplies\*
- laboratory consumables and equipment\*
- international student recruitment representatives

3.5 LSBU's reasonable assessment at this time is that categories highlighted with an asterisk \* carry potentially higher risks relating to modern slavery in their supply chains.

#### **4. Raising concerns**

4.1 Any person who has a concern that there is malpractice in relation to LBSU's activities anywhere in the world may raise their concern via the independent speak up helpline provided by Safecall (details are in the speak up policy).

#### **5. Current action**

- 5.1 LSBU is committed to carrying out procurement of goods and services in an environmentally, socially, ethically and economically responsible manner and to entering into agreements and contracts with suppliers that share and adhere to this commitment.
- 5.2 LSBU's procurement is either: (1) collaborative, through national public sector or regional higher education purchasing consortia; or (2) by in-house tendering and contracting.
- 5.3 LSBU is a member of the London Universities Purchasing Consortium (LUPC). LSBU engages with its purchasing consortia to support the inclusion of ethical sustainability, including addressing slavery and human trafficking, in their procurement programmes.
- 5.4 When procuring goods, works and services the university reviews corporate social responsibility in a range of methods, depending on the type of procurement being undertaken. All employees involved in university procurement processes are required to uphold the university's procurement code of ethics. This includes specific reference to modern slavery.
- 5.5 The university's sustainability steering group is responsible for the oversight, development and ongoing monitoring of the university environmental and sustainability policies and strategy (which include modern slavery).

## **6. The future**

- 6.1 LSBU will continue to develop its approach to better understand its supply chain and to encourage greater transparency and responsibility towards people working within them.
- 6.2 LSBU will continue to review its supply base and procurement processes to assess what steps need to be taken to prevent, monitor and mitigate risks where supply chains may pose particular risks

This statement has been approved by LSBU's Board of Governors and will be reviewed annually.