

# Group Modern Slavery Act Statement 2024-25

## Introduction to LSBU Group

London South Bank University (“LSBU” or “the University”) established in 1892 transforms lives, communities, businesses and society through applied education and insight. We were established 130 years ago with a mission to effect social mobility for the people of south London by improving their employment opportunities and providing access to the applied knowledge that would advance their businesses.

South Bank Colleges comprise Lambeth College and London South Bank Technical College. They offer a wide range of high-quality, professional and technical courses that open doors to future career opportunities in a vast array of sectors: health and social care, engineering and robotics, science, games design, hospitality, sport, digital media, IT and more.

South Bank Academies is a small, thriving multi-academy trust based in South London and comprises SBU Sixth based in Brixton and SBU Academies based in Southwark.

The LSBU Group, collectively, is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its activities and have a zero-tolerance approach to slavery and human trafficking in all its forms.

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and constitutes the LSBU Group’s slavery and human trafficking statement for the financial year beginning 1 August 2024 and ending 31 July 2025.

It sets out the steps taken across our operational activities in relation to which slavery and human trafficking in our supply chains and within our own organisations which through involvement with our business partners we will continue to take in relation to slavery and human trafficking.

In line with regulation, we aim to make progress over a period (two financial periods) across a broader range of potential exposures, while in this year’s reporting set out the steps which have been our priority under this new legislation.

## Structure of our organisation

Information regarding the Group’s business and structure is available at <https://www.lsbu.ac.uk/about-us/lsbu-group>

## Our Governance

The Sustainability Steering Group is responsible for the oversight, development and ongoing monitoring of the Groups environmental and sustainability strategy and

overall direction. Work within this area is reported to the Group's Executive Committee.



## Policy on slavery and human trafficking

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

In implementing this approach LSBU Group 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.

## Our Supply Chains

The Group's supply chains are truly diverse, with over 2,000 suppliers (domestic and international) supporting our delivery of high-quality teaching and research. All suppliers are assigned a commodity/cost code helping us to identify those who trade in commodities where potential for Modern Slavery and Human Trafficking is a higher risk. This insight is used to inform our sourcing activity.

The highest risk commodities areas have been identified as;

- Audio-Visual, IT & Multimedia Supplies.
- Catering Supplies & Services.
- Furniture, Furnishings & textiles.
- Janitorial & Domestic Supplies & Services.

- Professional & Bought-in Services including consultancy.
- Travel & Transport (incl. Vehicle hire & Subsistence).
- Estates & Buildings.

The principal categories which the Group deems as carrying significant risks are security, catering, cleaning, IT, laboratory consumables, uniforms and workwear.

The Group deems the corresponding source countries to be as follows:

<b><u>Category</u></b>	<b><u>Country</u></b>
Security and Reception services	United Kingdom
Catering services	United Kingdom
Cleaning services	United Kingdom
Laboratory consumables	Malaysia, Indonesia, India, Pakistan
IT Equipment*	East Asia, China, Eastern Europe, Mexico
Uniforms/Workwear	UK, Indonesia, Malaysia, China, Bangladesh

\*Due to the complexity of the IT supply chain the list of countries is not definitive and there are likely to be other countries where the equipment is manufactured.

LSBU Group is aware that goods and services produced or delivered within the UK may also put workers at risk of modern slavery and human trafficking.

## What are we doing in FY 25/26

The Group reaffirms its commitment to improving its understanding of supply chains and to continue to develop processes and ways of working to identify categories where the risk of modern slavery or human trafficking may exist. The Group will continue to work with its partners (especially the London Universities Purchasing Consortium (LUPC)) to gain experience of supply chain due diligence to mitigate the risks to human rights in supply chains.

## Our Commitment

We recognise that modern slavery is a significant global rights issue and includes human trafficking, forced and bonded labour, child labour, domestic servitude, and sex trafficking. We are committed to protecting and respecting human rights and have zero

tolerance approach to slavery and human trafficking in all its forms. We will act ethically and with integrity in all our relationships and use all reasonable endeavours to act directly and to influence others to ensure slavery and human trafficking is not taking place, wherever we can do so.

## **Preventing modern slavery on our premises**

We are vigorous in checking that our staff have the right to work in the UK, and where agency workers are used, LSBU Group engage with agencies that have been through a procurement process prior to appointment to the supplier list to ensure adherence to the Act. LSBU will continue to raise awareness among staff and students through a wide range of events, and where required with the relevant training.

LSBU Groups Ethical and sustainable initiatives such as living wage, fair trade and sustainable procurement practices and Net zero set out our commitment to workplace rights at LSBU Group.

LSBU Group's Equality, Diversity and Inclusion policy promotes an enabling and inclusive environment in which all members of the LSBU Group community are treated with dignity and respect.

LSBU Group have well established procurement regulations which sets out our principles and practices for staff in acquiring goods, services and works, and outlines the steps we take to ensure the adoption of an ethical procurement approach with our supply chain and partners.

## **Ethics Code**

LSBU Group operates within a published ethics code that applies to all students, staff, (including affiliate staff such as visiting professors and visiting lecturers) and its independent members and its committees and all external parties acting on behalf of LSBU Group. All parties have an individual responsibility (and in the case of external parties often a corporate responsibility) to uphold the principles. LSBU Group will continue, to promote ethical behaviour and conduct by continuing to raise awareness with all stakeholders.

## **Potential risk areas in our supply chain**

We continue to identify high risk areas, for which the supplier's Modern Slavery statement is reviewed and all new suppliers make a declaration of their awareness and adherence to the Modern Slavery Act and adherence to all relevant legislation in delivering the goods or services to LSBU Group.

We will continue to get a better understanding of the supply chain and will monitor those supply chains that have been identified as a potential risk and take appropriate action where necessary. Compliance to the Act shall be incorporated into the pre-qualification criteria for all tendered activity as well as full acceptance of LSBU Group's terms and conditions. LSBU Group will continue to risk assess the supplier base, to target the awareness and adherence of the Act.

## **Use of Purchasing Consortia**

LSBU Group also purchases via the APUC, NEUPC, SUPC, NWUPC consortia, Crown Commercial Services and G-Cloud 13 which have also published their own Slavery and Human Trafficking Statements. These bodies have together published a shared Sustainability Policy to which all member consortia are committed. All consortiums used ensure the core principles of the Act are embedded within all supply chain activity.

## **Proactive Management of LSBU Group Suppliers and their Supply Chains**

LUPC shall instigate during 2024/25 the implementation of NET positive Futures (NpF), a tool used by many HEIs to engage with its suppliers and monitor performance against a number of Sustainability and Social Value Criteria, which includes their response to the Modern Slavery Act.

## **Onboarding New Suppliers**

Where a requirement is lower value (i.e., below £50,000), and a less formal competitive quotation process has been undertaken, successful suppliers shall be instructed to complete a Supplier Information Sheet. This will include self-declarations regarding compliance with UK Law, including the Modern Slavery Act and UK GDPR. LSBU Group shall update this form to include an invitation to register on NETpositive Futures, if they have not already done so, as a way to understand and engage with our supply-base (and in particular MSMEs and local businesses) to promote and support alignment with LSBU Group's values where appropriate. At this lower value of business, it is not LSBU Group's intention to mandate the use of NpF.

For all other suppliers awarded business as a result of a tender, LSBU Group shall now be making it mandatory to register on NpF, complete the questionnaire and report on Action Plans put in place as a result of this process (or otherwise). LSBU Group will monitor each supplier's progress against the actions set out, not only as part of contract management but also as part of supplier improvement processes, with the objective of securing completed action plans with supporting evidence that the measures agreed have been put in place. LSBU Group is also committed to emailing all contracted suppliers over the next 24 months who are not already registered

instructing them to do so. As the number of suppliers registered on NpF increases, LSBU Group will be able to provide detailed statistics regarding progress.

## **Sustainability**

LSBU Group remains committed to embedding sustainability across all its activities, has an established sustainable strategy and policy, with a supporting Fairtrade policy to embed core principles of fair trade wherever possible within LSBU Group's supply chain. LSBU Group will continue to further promote Fairtrade principles wherever feasible in the acquisition and use of resources.

## **Approval**

This statement was approved by LSBU Group's Board of Governors on the 11<sup>th</sup> of December 2025 and will be reviewed annually.