

## Modern Slavery Statement 2018/2019

This statement has been published in accordance with Section 54 of the UK Modern Slavery Act 2015. It sets out the steps taken by North Western Universities Purchasing Consortium Limited (NWUPC Ltd) during the financial year ending 31<sup>st</sup> July 2019 to prevent modern slavery and human trafficking in our business and supply chains.

### Introduction

Slavery, servitude, forced labour and human trafficking (Modern Slavery) are issues of increasing concern, pertinent to all regions, sectors and economies. NWUPC Ltd has a Sustainability Strategy and Policy which demonstrates our commitment to Responsible Procurement. This is underpinned by the PEL Sustainable Procurement Policy, adopted by all consortia members of UKUPC, our shared vehicle for managing developmental and improvement projects for collaboration in English higher education procurement. As part of our approach we have a zero tolerance approach to modern slavery and strive for transparency within our supply chains.

### Our Structure and Supply Chains

32 Members	29 Frameworks	215 Suppliers	+ £180Million Spend
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NWUPC Ltd is a non-profit, professional buying organisation owned by its Members, for its Members, in the higher and further education, arts, sciences, health and cultural sectors. NWUPC Ltd exists to provide a structure for its members mutually to secure value for money through the collaborative procurement of goods and services, without causing harm to others.

Although NWUPC Ltd has an annual turnover far less than the threshold for the requirement to publish a statement under the Act, annual spend by our Members through NWUPC Ltd supply agreements, in excess of £220 million, warrants a statement on the risks inherent in our supply chains and the steps we are taking to address these.

Our supply chains fall under the following category areas:

ICT Equipment and Services	Estates and Facilities Management	Laboratory Consumables and Equipment	Professional Services
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Office Supplies and Equipment	Library Resources	Travel
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All the Frameworks within these categories have differing levels of risk attached. This risk has been assessed using the Marrakech Approach. Within the strategy documents for each Framework, the risk level is determined and appropriate actions considered.

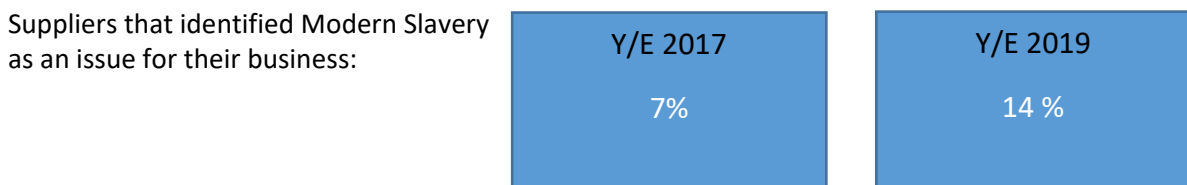
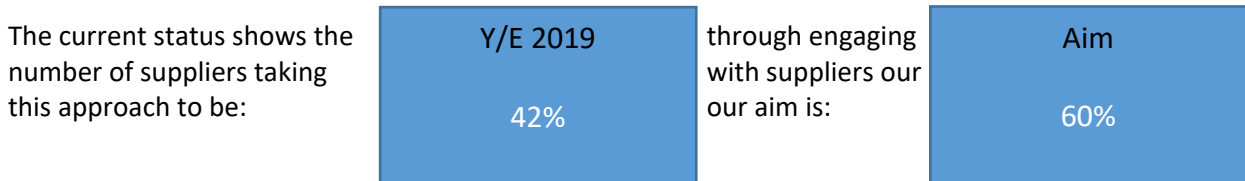
### Progress towards Action Plan

NWUPC Ltd is in its fifth year of utilising the NETpositive Supplier Engagement Tool to proactively respond to the Modern Slavery Act within our supply chains. We interpret the commitment to the eradication of Modern Slavery in broader terms than as prescribed under the Act and encourage all suppliers, irrespective of annual turnover, to make a public commitment to take action against Modern Slavery. The tool allows us to understand the percentage of suppliers who acknowledge Modern Slavery is an issue for their business, to identify resultant actions to be taken by them to address Modern Slavery; and to ascertain those suppliers that do not acknowledge Modern Slavery as a consideration.

Awareness of the Modern Slavery Act amongst our supply base:



In Y/E 2019 the tool was altered to reflect the maturity of the discussion around Modern Slavery and is now concerned with suppliers developing a robust plan and engaging with their supply chain to eradicate modern slavery.



Issue Identified	Future Commitment	Action Taken
Absence of Supply Chain Transparency	Supply chain mapping of all suppliers on framework agreements identified as high risk	All Frameworks include request for information on the supply chain of bidders at Tier 1 and Tier 2.  Data collected for high risk areas requesting the country of origin for the top volume products equating to £3.7million spend
Absence of oversight and detail on audit methodology	Requirement for the provision of audit reports	Implemented audit questionnaire  Started trial with suppliers.  Audit reports produced and made available to members.
Supplier perception of Modern Slavery obligations being confined to Section 54 reporting requirement	Engagement and education campaigns with suppliers to expand on their understanding of Modern Slavery going beyond a statement	Engagement with suppliers in contract management meetings.  Led to more suppliers indicating an understanding of Modern Slavery obligations.

## Future Plans

Heading into 2019/2020 NWUPC Ltd commits to reinforcing its approach to the eradication of Modern Slavery from our supply chains and having a broader impact on suppliers that we work with. We have developed the following action plan as our direction for the next twelve months.

Issue Identified	Action Taken	Next Steps
Deepening Supply Chain Transparency	All Frameworks include request for information on the supply chain of bidders at Tier 1 and Tier 2.  Data collected for high risk areas requesting the country of origin for the top volume products equating to £3.7million spend	Interrogate Tier 1 and Tier 2 and map out. Obtain audit information from suppliers.
Absence of oversight and detail on audit methodology	Implemented audit questionnaire  Started trial with suppliers.  Audit reports produced and made available to members.	Roll out across all high risk suppliers.

Supplier perception of Modern Slavery obligations being confined to Section 54 reporting requirement

Engagement with suppliers in contract management meetings.

Led to more suppliers indicating an understanding of Modern Slavery obligations.

Produce materials to support campaign.

Produce report on suppliers progress in high risk areas.



Julie-Ann Garton  
Managing Director