



Modern Slavery and Human Trafficking Statement 2020/2021

This statement is made pursuant to Section 54, of the Modern Slavery Act 2015 and sets out the steps the LSE has taken to identify, mitigate and prevent slavery or slavery-like practices, forced labour and human trafficking from taking place in our supply chains or in any part of LSE's business.

1. Our organisational structure

The LSE was founded in 1895 and is now one of the foremost social science universities in the world. As a specialist university, with a significant international intake, the LSE's reach extends from its central London campus to around the world.

The LSE is both a company limited by guarantee under the Companies Act 2006 and an exempt charity under Paragraph 2 of Schedule 3 of the Charities Act 2011. The registered office of the LSE is Houghton Street, London, WC2A 2AE, United Kingdom.

2. Our Commitment

The LSE is committed towards taking steps to identify, prevent and mitigate the risks of modern slavery, human trafficking, forced and bonded labour and labour rights violations in its supply chains and global activities. We are committed to ensuring that our activities, collaborations, our contractors and sub-contractors and all those in our supply chains comply with the Modern Slavery Act 2015.

The LSE also adopts the principles of the Ethical Trading Initiative Base Code of labour practice set out as follows:

- 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

The LSE also requires compliance with our Ethics Code. The Code contains a specific obligation to act with integrity and in accordance with all relevant legislation and statutory requirements. This includes compliance with the Modern Slavery Act 2015.

The School's mission of discovering, advancing and disseminating knowledge to address major socio-economic challenges across the globe will always carry certain risks. Effective risk management increases the likelihood of the successful achievement of the School's strategic objectives, whilst at the same time protecting its reputation and sustainability. We are committed to buying and sourcing ethically and to engaging our community on sustainability issues as set out in section 3.4 of our LSE 2030 strategy (invest in a world class environment).

The Modern Slavery working Group ('the Group') was set up in 2020 to review and enhance LSE's response to Modern Slavery and to consider what it has or could put in place in the future to address the potential incidence of modern slavery and human trafficking within its business, its supply chains and areas of activity, as well as any international activities in which the School partakes.

The approach taken is to integrate any action taken in line with our risk management practices and other relevant policies and procedures and take an informed risk-based approach to prioritize what we do. This includes work to further understand our supply base via greater supplier engagement and assessment of suppliers' positions in relation to Modern Slavery.

3. Reporting Concerns

The LSE takes all allegations of slavery and human trafficking seriously. All members of the LSE community including but not limited to staff, students and members of Council, are expected to report any concerns relating to slavery or human trafficking and encourage the disclosure of information about malpractice/ wrongdoing occurring in the School. Members of our community are signposted to [our advice and policies on seeking ethical advice and reporting concerns](#)

LSE complies with the Public Interest Disclosure 1998 and has its own Whistleblowing Policy [lsePubIntDisPro.pdf](#) . Any concerns raised relating to any suspected Modern Slavery via this route will be duly investigated with action taken as necessary.

4. Steps taken to identify and mitigate Modern Slavery Risks in 2020/2021

The Modern Slavery risks LSE are exposed to are not unique to it and are shared across the Higher Education Sector. LSE has taken several important steps to tackle any potential risks as follows:

1) Procurement and Supplier Engagement

The LSE Procurement Policy contains a specific requirement for all procurement to be undertaken in line with the LSE Ethics Code. We make our expectations clear in our Information for Suppliers. We typically use a tender process when awarding contracts. and in most cases our preference is to always use our own contract terms.

We have undertaken spend analysis against our activities in the previous financial year and mapped our expenditure against the risk assessment for modern slavery provided by the Higher Education Procurement Academy (HEPA).

This year, the Modern Slavery Working Group endorsed the purchase and implementation of the NETpositive Supplier Engagement Tool in order to help support our procurement response to Modern Slavery. The tool collects evidence for measurement and reporting against the Modern Slavery Statement of our suppliers. It assists in engaging suppliers on the issue of Modern Slavery, raise awareness of Modern Slavery amongst our Suppliers, helps to identify actions our suppliers are taking in response to the Modern Slavery Act and provides a mechanism for support, guidance and training to the supply base.

The LSE Procurement team are currently introducing all existing Suppliers to this tool as well as requesting new suppliers through the tendering process to complete the online assessment tool which in turn will enable us to gain a better understanding of each supplier and their position in relation to Modern Slavery. So far, 2776 suppliers to LSE were written to, to advise them of the tool and 760 suppliers have so far registered. Any areas of concern can then be addressed with a developmental approach being encouraged.

The Group and relevant members across the LSE have also been working on the creation of a Supplier Code of Practice ('Code') which is a reflection of who we are and what we stand for. It sets out minimum standards derived from established global conventions and standards including those set out by the United Nations, the Ethical Trading Initiative (ETI) base code, and the International Labour Organization (ILO) Conventions.

We expect all our Suppliers to abide by this Code, and to mandate these standards with their own suppliers and sub-contractors. This includes but is not limited to all our suppliers of goods and services, consultants, sub-contractors, service providers, intermediaries and agents.

LSE aims to assess a Supplier's compliance with this Code early on and prior to the start of a contract, aiming to notify a supplier of requirements set out under this Code as early as possible. This would be at the tendering stage for new contracts or during contract renewal for existing contracts. LSE reserves the right to monitor and review compliance, implementation and adherence with this Code via periodic reviews/audits as part of our contract management process.

2) Due Diligence

We recognise that there is a level of risk associated with the supply chains of goods and services we procure, although the risks we are exposed to are not unique to the LSE and are shared across the wider HE sector. We have worked to formulate due diligence processes that can be applied across the School where potential contractors, third party suppliers, collaborators and any other relevant third party are asked at an early stage about what policies and procedures they have in place to identify, prevent and mitigate against the risks of Modern Slavery. Due diligence assessments will contain specific questions about Modern Slavery.

The Group have established which areas of the School and which suppliers may be considered high risk and consider that further work will need to be carried out to further expand and formalize our due diligence processes. Further consideration is also being made on when implementation of such processes will take place.

3) Recruitment

The School ensures all legally compliant right to work checks are undertaken and that there is robust visa and immigration related advice/assistance information provided. The LSE is accredited by the Living Wage Foundation which certified that all staff are paid a real living wage. LSE evaluates its suppliers' approach to fair working practices, including the living wage in line with statutory guidance and compliance with its Supplier Code of Practice.

The School has taken steps to analyse the risks relating to staff recruitment and the use of recruitment agencies. Work has begun on centralizing the use of reputable and established recruitment agencies via the Procurement Team and the creation of a bespoke due diligence process that focuses on key issues including but not limited to Modern Slavery is being developed. Agencies used by the LSE will be asked to promote fair working practices. A standard contract for recruitment agencies which encapsulates the key terms and conditions the School would like to engage them on is also being developed.

4) Collaborations

We actively engage with the London Universities Purchasing Consortium ('LUPC') and are a member of the LUPC Executive Committee, framework supplier review groups, tender working parties and its Responsible Procurement Group which was set up to specifically address Modern Slavery Risks. This ensures that through this collaboration, maximum impact can be achieved with limited resources. Through LUPC we are affiliated to Electronics Watch which supports public sector organisations in monitoring the labour rights and safety of workers in global electronics supply chains.

Over the past year we have collaborated with other Universities within the HE sector to discuss and share good practice in the area of identifying, tackling and preventing Modern Slavery.

5) Training and Awareness

In 2020/2021 all procurement staff received training by passing the HEPA e-learning module on Modern Slavery to help identify the risks of modern slavery and improve procurement practices. Any new members of the Procurement Team will also be required to complete this training in order to continue improving procurement practices in this area. Our Data & Technology Services (DTS) team received an awareness session on modern slavery in electronics supply chains.

All Procurement team members are members of the Chartered Institute of Procurement and Supply (CIPS). Those responsible for tendering and contracts in the Procurement team all hold MCIPS Chartered status or are actively working towards. Those with MCIPS maintain their MCIPS Chartered status by completing the annual CIPS ethical course along with recording 35 hours CPD annually.

By ensuring all of the Procurement team staff are trained in ethical sourcing and supplier management annually the School is proudly registered on the CIPS corporate ethics register.

5. Next Steps for 2021/2022

- Develop a Modern Slavery dashboard with key indicators of performance for operations and supply chains

- Further develop due diligence procedures and focus on high-risk areas/suppliers.
- Review our Modern Slavery contractual clauses in all our contracts
- Continually review relationships with all suppliers and assess any concerns of slavery or human trafficking on a case-by-case basis.
- Further progress work on recruitment agencies and ensure that relevant recruitment policies set out requirements to be aware of Modern Slavery.
- Work to ensure that Modern Slavery is considered within academic and research partnerships due diligence processes.
- Continue to work with Electronics Watch and widen the awareness of their work and other modern slavery issues to all other Professional Services areas and academic departmental managers.
- Work on a training and awareness plan identifying key categories of individuals/areas to be trained and what level/type of training should take place. This would involve considering the various training providers available and liaising with the School's Organisational Learning team. Training would include but would not be limited to how to identify what modern slavery is in practice and how to prevent it and report on incidents and concerns. But also consider how to spot signs of exploitation and what steps should be taken if an individual suspects that exploitation is taking place.
- Create a webpage for the Modern Slavery Working Group outlining our aims and add further information on Modern Slavery, resources, training, and reporting of potential incidents of Modern Slavery.
- Develop and build networks and further engage and collaborate with other organisations and Universities and share good practice. To also consider joint initiatives with the LSE Students Union.



Baroness Minouche Shafik
Director of LSE

Review schedule

Review interval	Next review due by	Next review start
1 year	1 November 2022	1 September 2022

Version history

Version	Date	Approved by	Notes
2	23 rd November 2021	Council	
1	24 th November 2020	Council	

Links

Related Policies/Procedures	Link
LSE Sustainable Procurement Policy	LSE-procurement-sustainability-policy.pdf
Ethical and Sustainable Procurement Checklist	Ethical-and-Sustainable-Procurement-Checklist.xlsx (live.com)
Whistleblowing Policy	https://info.lse.ac.uk/staff/Services/Policies-and-procedures/Assets/Documents/lsePubIntDisPro.pdf
The Ethics Code	https://info.lse.ac.uk/staff/divisions/Secretarys-Division/Assets/Documents/Ethics/EthicsCodeA5postcard.pdf

Contacts

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Communications and Training

Will this document be publicised through Internal Communications?	Yes
Will training needs arise from this policy	Yes
If Yes, please give details Further guidance and training in relation to this Policy to be looked at by the Modern Slavery Working Group.	

