



Statement on Slavery and Human Trafficking for Financial Year 2021/22

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, ranked alongside Harvard, UC Berkeley and Stanford. As a specialist university, with an 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 and this year has created its own Supplier Code of Practice.

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 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 2019 to review and enhance LSE's response to Modern Slavery and to consider what it has or could put in place to address the potential incidence of modern slavery and human trafficking within its business and within its supply chains and areas of activity as well as in any international activities the School partakes in.

3. Reporting Concerns

The LSE takes all reports of labour rights abuses, modern 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 modern slavery or human trafficking and encourage the disclosure of information about malpractice / wrongdoing occurring in the School. Members of our LSE community are signposted to:

[Seeking ethical advice and reporting concerns:](https://info.lse.ac.uk/staff/divisions/Secretarys-Division/Ethics/Seeking-ethical-advice-and-reporting-concerns)

<https://info.lse.ac.uk/staff/divisions/Secretarys-Division/Ethics/Seeking-ethical-advice-and-reporting-concerns>

Whistleblowing Policy:

[lsePubIntDisPro.pdf](#)

Any concerns raised relating to any suspected Modern Slavery in the School will be duly investigated with action taken as necessary.

1) Procurement and Supplier Engagement

During this financial year, The LSE Procurement Policy contains a specific requirement for all procurement to be undertaken in line with the LSE Ethics Code and Supplier Code of Practice. We make our expectations clear in our [Information for Suppliers](#). We use a rigorous tender process for supply agreements, and our preference is to always use our own contract terms rather than a supplier's because this provides far greater contractual protection. This enables the LSE to ensure that suppliers are aware of the LSE's position in relation to slavery and human trafficking and permits the LSE to terminate any agreement where it is confirmed that there is slavery or human trafficking involved.

We have undertaken spend analysis against our activities in 2021/2022 and mapped our expenditure against the risk assessment for modern slavery provided by the Higher Education Procurement Academy (HEPA).

Our Procurement team have been asking Suppliers to engage with the NETpositive Supplier Engagement Tool in order to help support our procurement response to Modern Slavery. The tool assists in engaging suppliers on the issue of Modern Slavery, raises 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 to share best practice between suppliers.

The LSE Supplier Code of Practice

Over the past year, Supplier Code of Practice ('the Code') [codSupPra.pdf \(lse.ac.uk\)](#) was created. It is a reflection of who we are and what we stand for and sets out minimum standards derived from established global conventions and standards including from the United Nations, the Ethical Trading Initiative (ETI) base code, and the International Labour Organization (ILO) Conventions. The expectation is that all our Suppliers will comply /take steps to comply with this Code and mandate these standards from their own suppliers and sub-contractors. This would apply to all of our suppliers of goods and

services, consultants, sub-contractors, service providers, intermediaries and agents. In addition to Suppliers, the School also expects other organisations or institutions we collaborate with to also comply with the minimum standards set out in this Code

LSE aims to assess a Supplier's compliance with this Code early on, 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. This Code incorporates elements of the 2021 Sustain Code of Conduct which the School also collaborated on as a member of the London Universities Purchasing Consortium (LUPC).

2) Due Diligence

We recognise that there is a level of risk in 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 HE sector. We have worked to formulate Due Diligence processes that can be applied across the School where potential contractors, third part 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 questionnaires will contain specific questions about Modern Slavery.

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

3) Recruitment

The School ensures all legal right to work checks are undertaken and that there are robust visa advice/assistance provided. The LSE is accredited by the Living Wage Foundation which certified that all staff are paid a real living wage. LSE evaluates 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 centralising 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 Modern Slavery is being developed. Agencies 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 recruitment agencies on is also being developed.

A strategy plan has been drafted and accepted for staff recruitment agencies, with three main suppliers, a preferred supply list (PSL) for less frequent suppliers and 'one-off' due diligence agreements for specialist/unique roles, all suppliers will be required to comply with the LSE Supplier Code of Practice.

4) Collaborations

We actively engage with the London Universities Purchasing Consortium ("LUPC") and a member of the LUPC Executive Committee, framework supplier review groups, tender working parties and its Responsible Procurement Group that was setup 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. Our Procurement Director is also a member of the Board of Trustees; The Board of Trustees is responsible for fiduciary

and programmatic guidance and oversight to ensure Electronics Watch achieves its mission and purpose and operates legally, ethically, and soundly.

5) Training and Awareness

Procurement staff receive training by passing the Higher Education Procurement Academy (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. Staff within DTS have set up a working group to focus on our IT buying practices.

Our Procurement team are all professionally qualified and maintain their certification by completing the Chartered Institute of Purchasing and Supply Ethical Procurement and Supply course annually. Over the past year, the Modern Slavery Working Group has been exploring options for wider training across the School and has spoken to various specialist organisations to consider types of training on offer and the categories of staff that should be trained. This training will take place in the coming year.

Next Steps

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

A dashboard has been developed and takes in consideration of these category codings and risks.

Category codes have been applied to this dashboard.

Risks considered are:

Equality; Environmental / Sustainable; Waste Electrical and Electronic Equipment recycling (WEEE)/ disposal; Social issues; GDPR; and Modern Slavery.

In the coming year we will be monitoring our main suppliers against these risks and will ensure they are being assessed against our independent risk assessment system (<https://netpositivefutures.co.uk/>). We will also use Constructionline and our Supplier Code of Practice as our key tools.

Construction and Maintenance

As a high value, high risk and strategically important category, LSE have previously considered wider impacts to its decision making processes. However, in future LSE will now assess consistently each live supplier contract (and future contracts in the tender process) above the value of £100,000 against the LSE Supplier Code of Practice for individual actions plans.

We will investigate those same suppliers and request they respond to all questions and criteria in their Constructionline profile and we will assess their responses for feedback and appropriate actions where necessary. (<https://www.constructionline.co.uk/>)

Information Technology

As a high value, high risk and strategic important category, LSE will assess each live supplier contract above the value of £100,000 (and future contracts in the tender process) against the LSE Supplier Code of Practice for individual action plans.

We will investigate those same suppliers and assess them through our independent risk assessment system.

2. Further develop due diligence procedures and focus on high-risk areas/suppliers.

Our Procurement Strategy has been changed and now all category plans will have responsible and sustainable procurement contents as mandatory.

Before each tender request, a procurement initiation document (PRID) will be completed and now includes elements of the LSE Supplier Code of Practice, this can be found here: [codSupPra.pdf \(lse.ac.uk\)](#)

For the next year tender questions to assess bidders capabilities against these practices and risks will be drafted and provided in a template format to be developed further by the tender evaluation panel prior to issuing the final tender document to bidders. These questions will be written in such a way that the responses will assess the current position of their individual journeys to produce a score that contributes to the overall decision. These questions will also be enabled for the responses to be developed further; this would be encouraged and applied through the contract management process.

Questions on due diligence relating to Modern Slavery are currently included in other due diligence questionnaires that are used in research collaborations / other types of collaborations.

3. Review our Modern Slavery contractual clauses in all our contracts and develop specific modern slavery contractual clauses where required.

4. Continually review relationships with all suppliers and assess any concerns of slavery or human trafficking on a case-by-case basis.

Contract management guidance has been updated and now includes responsible procurement and supply chain risks for consideration and discussion, these now form part of the contract management process.

Training this year will take place for relevant individuals within LSE divisions, departments and centres responsible for contract management. Resources will also be provided with further details, including responsible procurement and supply chain risks.

5. Further progress work on recruitment agencies and ensure that relevant recruitment policies set out requirements to be aware of Modern Slavery.

During the coming year we will also provide 'an introduction to LSE' guide to provide temporary workers on campus information on what their entitlements are in terms of what they should expect from LSE and their respective agency employer to ensure they are treated equally when compared to the directly employed LSE staff.

The Group will also be working with the Human Resources Division in order to add a section on Modern Slavery within the staff induction programme and consider what policies and procedures may need to be added.

6. Work to ensure that Modern Slavery is considered within academic and research partnerships due diligence processes.

Work had been done on due diligence for research contracts. Further work will be undertaken with major LSE research centres and the Research and Innovation Division to standardise modern slavery due diligence in our systems.

During the coming year, a strategy will be established to consider all of the aspects of the current processes and ensure consistency of modern slavery risks across academic and research areas.

7. 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.

LSE continues to work with Electronics Watch and has an on-going presence on the Board of Trustees. LSE will be considering any future procurement activity with EW best practice methods.

LSE will be speaking at the next Eworld Procurement event to deliver this session: "Who is Responsible for the Supply Chain?" Practical Steps for Procurement Leaders.

The London eWorld event has run bi-annually since 2001, becoming an important forum for procurement and supply chain professionals to meet leading technology experts, key suppliers and their immediate peers – to gather fresh inspiration, discuss common issues, learn about new products & services and build mutually profitable relationships.

8. Undertake training via a specialised provider identifying key categories of individuals/areas across the School to be trained and what level/type of training should take place. 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.

9. Raise further awareness on Modern Slavery and human trafficking via the creation of a webpage for the Modern Slavery Working Group outlining the aims of the Group and adding further information on Modern Slavery, resources, training, and the reporting of potential incidents of Modern Slavery. The Group will work on a central communication in the School's staff news outlining the work carried out by the Group and raising awareness of the key issues relating to Modern Slavery and Human Trafficking.

10. 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.

LSE are a member of the London Universities Purchasing Consortium and Southern Universities Purchasing Consortium Responsible Procurement Group which enable members to attend events with expert external speakers, and member case studies with hands-on, practical experience advice to share. These members include universities, colleges and public sector organisations.

The Group will look to develop other networks during the year and will also look to work on joint initiatives with the Students' Union.

11. Supply Chain Investigation Program

The LSE will be running a graduation services procurement contract replacement project, and as a strategic requirement to the LSE and high risk in terms of modern slavery in the supply chain, we will be assessing bidders on their supply chains and the LSE will also develop management of those supply chains during the life of the resulting contract.



Baroness Minouche Shafik
Director of LSE

Review schedule

Review interval	Next review due by	Next review start
1 year	1 November 2023	1 September 2023

Version history

Version	Date	Approved by	Notes
3	22 nd November 2022	Council	
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
The Supplier Code of Practice	codSupPra.pdf (lse.ac.uk)
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

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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.	

