



Statement on Slavery and Human Trafficking for Financial Year 2022/23

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 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 engage 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, areas of activity as well as in any international activities the School partakes in.

3. Reporting Concerns in the School

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>

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.

4. 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 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. Specific Modern Slavery contractual clauses are being inserted into new contracts with a specific focus on those medium-high risk categories.

We have undertaken spend analysis against our activities in 2022/2023 and mapped our expenditure against the risk assessment for modern slavery provided by the Higher Education Procurement Academy (HEPA).

A Modern Slavery dashboard with key indicators of performance for operations and supply has been developed as follows:

Category	Spend	Modern Slavery Risk Rating
Professional & Bought-in Services including Consultancy	£38m (2252 suppliers)	Low
Estates & Buildings	£30m (111 suppliers)	Medium
Computer Supplies and Services	£11m (191 suppliers)	High
Utilities	£10m (6 suppliers)	Low
Travel and Transport	£5m (134 suppliers)	Low

Catering Supplies and Services	£5m (132 suppliers)	Medium
Library & Publications	£2m (124 suppliers)	Low
Health and Safety & Security	£2m (50 suppliers)	Low
Audio Visual Supplies and Services	£2m (49 supplier)	High
Facilities Operations	£2m (31 suppliers)	Medium

Our Procurement team have continued to ask 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.

LSE has 11,831 registered suppliers on its Finance System, an order was placed with 7120 of them in the last financial year. There are 239 suppliers where we have spent more than £50,000 in a single year. We currently have 678 suppliers who have already completed our independent risk assessment system.

The IT category is a high risk for the LSE and as such the contract was re-tendered and responsible procurement played a meaningful role in the decision making. The newly awarded supplier has completed the Net Positives tool.

The AV category is our other high risk & spend area, the two largest suppliers of AV equipment have completed the Net Positives tool. LSE also has access to Creditsafe & Constructionline which it considers as part of its overall due diligence during construction related tenders.

As part of the tender for graduation services (gowns provision), the winner bidder's locations in Cambridgeshire and London were visited by members of the Procurement team. The audit was positive, materials were locally sourced, the staff turnover was very low, flexible working was offered to Seamsters, apprenticeships were in place, the supplier had not been audited before by a procurement team and as a result of our intervention, they plan to deliver greater transparency of its inner workings through corporate videos explaining their processes and they plan to offer factory tours to their other customers in the future.

The LSE Supplier Code of Practice

Following the creation of the Supplier Code of Practice ('the Code') [codSupPra.pdf \(lse.ac.uk\)](#), the Procurement Team have worked to ensure that it is embedded at the tendering stage for new contracts or during contract renewal for existing contracts. The Legal Team are also ensuring that the Code is embedded within key contracts, 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 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.

5. 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. A questions library has been created, including asking for evidence where appropriate and the key stakeholders across the School met to discuss due diligence processes and the needs within each specific area.

6. 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 it's Supplier Code of Practice.

The School has taken steps to analyse the risks relating to staff recruitment and the use of recruitment agencies. Over the past year further work has been undertaken 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. 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 will be provided.

Two main suppliers have signed contracts, and a third has been planned. We will also soon have approximately 10 suppliers on our preferred supplier list, all of which will have contracts that will request compliance with the LSE Supplier Code of Practice.

7. 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.

LSE contributed to the Electronics Watch Strategy Plan (2024-2028) Review and has also been supporting endeavours to work with specific IT brands who were previously not engaging with Electronics Watch. The objective of the brand engagement is to improve the information and access for monitoring partners who collect evidence on the progress made in eradicating modern slavery abuses.

The Higher Education Procurement Academy (HEPA) has re-started the Responsible Procurement Group (RPG) which members of the School attended. The RPG has set up several sub-groups to discuss the issues in more detail including but not limited to supply chain emissions, modern slavery circular economy & waste reduction, social responsibility, and supplier assurance (task and finish group).

The Group also collaborated with other Universities and did a focus session on the Slavery-Free Campus blueprint for University Action against Modern Slavery which was created by the Human Rights Lab at the University of Nottingham.

8. Training and Awareness

Procurement staff receive 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 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 Group has initiated training via a specialist organisation for our Procurement team and members of the Estates Division as well as bespoke training for our Human Resources Division, Student Services and Counselling Services. Members of the Group also provided supplementary training based to the Human Resources Division to highlight key risks.

Next Steps

1. Ongoing development to current risk assessments and use of the netpositive tool amongst suppliers

The Procurement team will write to a selection of suppliers on our larger spending contracts, where we would have a larger impact, to encourage them to provide details on the netpositive tool.

Our use and analysis of the net positive tool will be ongoing to support our supply chain in creating their own action plans to mitigate the risk of Modern Slavery in the supply chain. In the coming year the Group would like to focus on the area of medium-high risk.

2. Further develop due diligence procedures and focus on medium/ 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 \(lse.ac.uk\)](https://www.lse.ac.uk/codSupPra.pdf)

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 tendering 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.

The Group will ensure that modern slavery questions are also considered and incorporated into any due diligence relating to donations/fundraising.

3. Continue to ensure that specific Modern Slavery contractual clauses are included in contracts and specifically those contracts which may be considered high risk.

The Legal and Procurement Teams to take a lead on this over the coming year.

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.

Further training will be initiated this year with a focus on Construction which is considered a high-risk area. 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 rights and 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 Human Resources Division will work with the Procurement team to deliver this guidance along with a process map for staff to use.

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.

Further work will be carried out to ensure recruitment policies and other relevant policies/procedures within the Human Resources Division address key risks in relation to Modern Slavery.

6. Further consideration of reporting and escalation routes where an incident of Modern Slavery may occur and be disclosed/reported by a member of staff/student or a third party.

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

Continuous 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 the Due Diligence policy and questionnaires will be reviewed and updated to ensure consistency of modern slavery risks across academic and research areas.

8. 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.

In the coming year, members of the Procurement team will be attending and contributing to three days of workshops for Public buyers and workers - advancing human rights together within the U.K. and other parts of Europe.

9. Develop appropriate training to new and existing members of staff in relation to Modern Slavery

Training with a focus on medium to high risk contracts /suppliers such as in Construction will be initiated in the coming year. The Chair of the Group will also undertake training for safe contacts on Modern Slavery, spotting the signs of Modern Slavery and how to escalate incidents that may arise. Further liaison with specialist providers to run bespoke training will also be considered.

Modern Slavery in the Supply Chain training followed by a workshop with key buyers in the School to be jointly delivered by the Procurement team and an external facilitator for Medium and High risk supply chains. The outputs of the workshop would help to inform future tendering strategies.

10. 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.

This is an ongoing piece of work which will be developed in the coming year.

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

The Social responsibility sub-group (which includes modern slavery) will develop a tool kit of templates and questions for suppliers to complete which will include knowledge from LSE and the wider Higher Education sector.

The Group will continue to collaborate with other Universities in this area as well as specialist organisations such as the Gangmasters and Labour Abuse Authority.

12. Supply Chain Investigation Program

The LSE have run 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.

The graduation services contract shall have ongoing management in terms of both its delivered services and inputs into the services via its supply chains.

Further work will commence to see how a similar investigation could be carried out for other categories, including those not located in the UK.



Professor Eric Neumayer
Interim Director of LSE

Review schedule

Review interval	Next review due by	Next review start
1 year	1 November 2024	1 July 2023

Version history

Version	Date	Approved by	Notes
4	21 st November 2023	Council	
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

Contacts

Position	Name	Email	Notes
Senior Legal Counsel	Refel Ismail	r.ismail@lse.ac.uk	Author and Chair of Modern Slavery Working Group.

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.	