

Liverpool John Moores University Modern Slavery Act Transparency Statement

This statement has been published in accordance with section 54(1) of the Modern Slavery Act 2015. It sets out the steps taken by Liverpool John Moores University during the financial year ending 31 July 2016 to prevent Modern Slavery and Human Trafficking in its business and supply chains.

1. Introduction

1.1 We know that slavery, servitude, forced labour and human trafficking is a global issue, existing in every region in the world and in every type of economy. As a University with a global approach and footprint, we are committed to improving our practices to play our part in eradicating slavery and human trafficking. Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

1.2 We are committed to better understanding our supply chains and working towards greater transparency in, and responsibility towards, people working within them.

1.3 We are committed to working with our suppliers in our supply chains to encourage more of them to commit to the highest standards of business in dealing with Modern Slavery.

2. Our Business and Structure

2.1 Liverpool John Moores University is a modern civic university, integral to the life of the City of Liverpool, yet with a global approach and footprint.

2.2 We are one of the largest Universities in the UK, home to over 23,500 students and 2,400 staff, drawn from over 100 countries world-wide. We purchase around £56m of goods, services and works through various supply chain arrangements each year. We collaborate with a number of international partners to facilitate world-leading research and collaboration, in order to tackle some of the huge global issues facing the modern world. At any one time, we have around 1,650 students enrolled on accredited University courses overseas.

2.3 The University was established as a Higher Education Corporation under section 124A(3) and (4) of the Education Reform Act 1988. It is a legally independent corporate institution with charitable status accountable through a governing body which carries ultimate responsibility for all aspects of the University.

2.4 The University is an exempt charity under the Charities Act 2011. We are supervised by the Higher Education Funding Council for England which is charged, as our principal regulator, with ensuring we fulfil our obligations under charities law.

2.5 Our day to day operations are overseen by a Strategic Management Team, headed by the Vice Chancellor and Chief Executive. Our academic structure is divided into four Faculties, each of which is led by an Executive Dean. We have three business services divisions (Organisational Enhancement; Finance and Resources; Student and Academic Services), each of which is led by a Deputy Chief Executive.

2.6 Given the complexity and evolving nature of Modern Slavery and Human Trafficking, we will formalise our internal governance of this risk at the highest level: the approval and use of suppliers by Faculties and Divisions will be in compliance with the appropriate due diligence requirements from the Procurement function within Finance and Resources. There will be central oversight of compliance conducted by the LJMU Procurement team.

2.7 Progress will be reported annually to the Board of Governors.

3. Our Values

3.1 We are a socially responsible institution. We are aware of our impact as an organisation within our local community. We recognise our responsibilities as a major employer and contributor to the local economy and to society at large. Equally we seek to minimise our environmental impact and encourage responsible and ethical behaviour in all aspects of our operations.

3.2 Our values and commitments are embedded in our [Strategic Plan 2012-17](#). We have undertaken within our Strategic Plan to trade With integrity. We have a number of policies and procedures which embed these values into our day-to-day activities.

4. Due Diligence and Audits of Suppliers and Supply Chain

4.1 Our supply chain includes a large number of diverse suppliers, including suppliers of goods and services that directly support research and teaching activity, for example, for the supply of student computer equipment, library services including books and online services, and suppliers of indirect goods and services not directly related to these activities such as estate maintenance expenditure.

4.2 Our main areas of expenditure can broadly be classified as follows:

Expenditure type	Value £m	%
Academic and related expenditure	87.4	47.2
Academic services	23.8	12.8
Administration and central services	9.5	5.1
Premises	26.4	14.2
Residences and catering	1.8	1.0
Research grants and contracts	6.8	3.7
General Education	10.1	5.5
Staff and student facilities	7.3	3.9

Other Expenses	12.2	6.6
Total	185.3	100

4.3 We procure goods and services from suppliers across the world. As part of our initiative to identify and mitigate risk in respect of our supply chain, we are implementing systems to identify and assess potential risk areas in our supply chains and to mitigate the risk of Modern Slavery and Human Trafficking occurring in our supply chains.

4.4 During financial year ending 31 July 2016, we extended our due diligence on suppliers/contractors to include questions about Modern Slavery Act compliance and we have started the process of amending contractual documentation to impose contractual obligations on suppliers/contractors to adhere to the Modern Slavery Act. As part of due diligence, we provide a summary of the offences under the Act to raise awareness of these issues, particularly for smaller organisations or overseas partners that may not be familiar with the scope of the Act. In the financial year 2016/17 we will formalise and embed our MSA due diligence through specific compliance software, reviewing current suppliers in priority order based on highest risk/spend criteria.

5. Our Policies and Contractual Controls

Finance

5.1 We have an Ethics Policy Framework, designed to organise the University's ethics related policies into categories and groups to assist staff in giving due consideration to ethical issues arising from the University's activities. This is an overarching framework providing guidance to support the University's vision, mission and values and the Ethical Investment Policy, Fairtrade Policy, Procurement Strategy, Sustainable Procurement Policy and Financial Due Diligence Process are all set within that Framework.

5.2 We operate a Whistleblowing Policy for our employees, students and others working in our supply chains which encourages the reporting of any wrongdoing, which extends to human rights violations like Modern Slavery. All reports are fully investigated and appropriate remedial actions taken.

5.3 Our Sustainable Procurement Policy, in conjunction with our Procurement Strategy, sets out our aims in relation to developing ethical criteria in supplier and product/service selection. Staff are advised to consider suppliers' environmental and social credentials during the contracting process.

5.4 We are a Fairtrade University, embedding our commitment in our Strategic Plan to "trade with integrity".

Research

5.5 We have a Research Code of Practice which provides a framework for good ethical governance to be followed when staff and students undertake any academic activities.

Employment

5.6 At the point of recruitment, we ensure that appropriate checks on prospective employees are completed in accordance with the law. We have a comprehensive Recruitment Policy and training programme for those involved in recruitment to ensure compliance.

5.7 We are committed to ensuring that people are paid appropriately for the work that they carry out. In March 2016, we became the first University in Liverpool, and the largest employer in Liverpool, to be accredited as a Living Wage employer.

5.8 In June 2016, we were awarded the Workplace Wellbeing Charter Accreditation, reflecting our commitment to ensuring the health and safety of staff working at the University. We have set ourselves a goal of securing a rating of "Excellence" for all criteria by implementing a number of initiatives to support the next stage of accreditation.

5.9 We place the highest importance on the integrity of our operations, and have in place a number of policies and procedures to address problems that may arise for our students and staff.

6. Training

6.1 The University provides staff involved in recruitment with appropriate training, to ensure legal compliance.

6.2 Our Finance staff receive regular training and updates on changes to the law. Not only will the key procurement staff receive comprehensive training on MSA obligations in conjunction with the roll out of designated software, but in addition many more Finance staff will receive training to enable them to provide support in the Faculties and Divisions they assist.

6.3 To ensure a high level of understanding of the risks of Modern Slavery and Human Trafficking in our supply chains, we have been working to develop bespoke online MSA training for our staff, which we aim to roll out in academic year 2016/17. We have been leading on the development of a product which can be used by other Universities.

7. Assessment of Effectiveness in Preventing Modern Slavery and Human Trafficking

7.1 We have taken the first steps to eliminate the risk of Modern Slavery and Human Trafficking from our business and supply chain. We appreciate that this risk is not static and that this will be a long journey, as we raise awareness both within the University and with our partners and stakeholders. We have clear plans for the year ahead in terms of further steps we will be taking to mitigate Modern Slavery risk.

7.2 In order to assess the effectiveness of the measures taken by the University we will be reviewing the following key performance indicators and reporting on them in our future Modern Slavery statements:

- Actions taken to strengthen supply chain auditing and verification;
- Steps taken to upskill any suppliers identified as "high risk", and assessing their ability to detect and mitigate Modern Slavery risk in supply chains;
- Staff training levels;
- Investigations undertaken into reports of Modern Slavery and remedial actions taken in response.

8. Our Plans for the Future

8.1 We commit to better understand our supply chains in their entirety and work towards greater transparency and responsibility towards people working within them.

8.2 We will continue to implement and develop the following action plan to address the risks Modern Slavery and Human Trafficking represent in our business and supply chains:

- We will formalise and embed our MSA due diligence through specific compliance software, reviewing current suppliers in priority order based on highest risk/spend criteria.
- We will review and monitor supplier action plans through regular contract management and support initiatives to reduce the risk of Human Trafficking occurring.
- We will develop and implement our own Anti-Slavery and Human Trafficking Policy, to provide clear and easily accessible guidance on Modern Slavery and Human Trafficking to all staff, contractors and other business partners and the measures being taken by the University to tackle Modern Slavery and Human Trafficking in its business and supply chains
- We will arrange a Modern Slavery and Human Trafficking awareness raising day, in partnership with Liverpool Students' Union, to ensure that all those in our University community are aware of the problems of slavery, servitude, forced labour and human trafficking. By promoting discussion and awareness we will raise the profile of this issue internally and externally and all staff and students will be reminded of ways to report any concerns.
- We will complete training for all key staff on MSA compliance.
- We will review and update all relevant policies and controls to embed MSA awareness.
- We will undertake an audit of all non-employed labour across the University, to understand better the labour arrangements we have in place and to minimise the risks of Modern Slavery and Human Trafficking occurring within our business.

If you have questions about this statement, please contact Belinda McGuinness, Deputy Finance Director (B.Mcguinness@ljmu.ac.uk).

Declaration

This statement has been approved and published by the Vice-Chancellor's Office and will be reviewed at least once annually.

Signed

A handwritten signature in black ink, reading "N. P. Weatherill". The signature is written in a cursive style with a large initial 'N' and 'P'.

**Professor Nigel Weatherill DL DSc FEng FRSA
Vice-Chancellor , Liverpool John Moores University**