

# Liverpool John Moores University Modern Slavery Act Transparency Statement 2019/20

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 2020 to prevent Modern Slavery and Human Trafficking in its business and supply chains.

## 1. Introduction

**1.1** Liverpool John Moores University published its first Modern Slavery transparency statement in January 2017. Since then we have taken positive steps towards increasing our understanding of the risks we face. 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 forging international partnerships to facilitate world-leading research and collaboration in order to tackle some of the huge global issues facing the modern world.

**2.2** With roots dating back to 1823, we are one of the largest Universities in the UK. Home to over 23,800 students and 2,400 staff, drawn from over 120 countries world-wide, our academic structure is divided into five faculties, each home to world-leading research, teaching and learning in a wide range of fields. At any one time, we have around 2,000 students enrolled on accredited University courses overseas.

**2.3** The University partners with like-minded institutions and organisations within the UK and around the world to deliver its learning programmes.

**2.4** The University has six subsidiary companies, all based in the UK:

- JMU Services Limited
- JMU Learning Resource Centre Development Limited

- JMU Property Development Company Limited
- JMU Building Services & Maintenance Limited
- LJMU Recruitment Agency Limited
- The Liverpool Business School Limited

**2.5** The University has a 50% interest in the company Sensor City Liverpool Limited, which is treated as a joint venture, a 25% interest in Sciointec Developments Limited, which is treated as an associate, and which owns 100% of Liverpool Science Park Limited.

**2.6** 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.

**2.7** The University is an exempt charity under the Charities Act 2011. The Office for Students is our principal regulator, ensuring we fulfil our obligations under charities law.

**2.8** Our day to day operations are overseen by an Executive Leadership Team (ELT), headed by the Vice Chancellor. During 2019/20 each of our five faculties was led by a Pro-Vice-Chancellor. We had three business services divisions, led by a Finance Director, Executive Director of Human Resources and Registrar & Chief Operating Officer.

**2.9** Given the complexity and evolving nature of Modern Slavery and Human Trafficking, we have formalised our internal governance of this risk at the highest level: Pro-Vice-Chancellors of each academic area and the ELT lead of each of the business services divisions are responsible for ensuring that their respective areas comply with due diligence requirements set and overseen by the finance team in relation to the approval and use of suppliers and the approval of collaborative partners. Pro-Vice-Chancellors and ELT leads are required to certify compliance in their respective areas on an annual basis.

**2.10** Progress will continue to be reported annually to the Board of Governors.

### **3. Our Values**

**3.1** Our forerunner The Liverpool Mechanics Institute was founded in 1823 on the ethos of transformation first of the individual, then through them, of communities, cities and the world. In our 27<sup>th</sup> year as a University we still remain true to this heritage.

**3.2** We are a socially responsible institution, 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.

**3.3** Our values and commitments are embedded in our Strategic Plan 2017-22, which can be accessed ([here](#)). We have undertaken within our Strategic Plan to act as a catalyst for

social change. We have a number of policies and procedures, which embed these values into our day-to-day activities (see section 6).

## 4. Supply Chain

**4.1** During 2019/20 we purchased approximately £102m of goods, services and works through various supply chain arrangements.

**4.2** 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. A large proportion is bought through frameworks established by collaborative HE consortia.

**4.3** Our main areas of non-pay expenditure can broadly be classified as follows:

Expenditure type	%
Academic departments and services	20.0
Administration and central services	11.0
Capital and estates	65.0
Residences, catering and conferences	0.6
Research grants and contract	3.4

**4.4** We procure goods and services from suppliers across the world and although we consider our day to day activities are low risk, we recognise that the global nature of our supply chains may increase the risk of Modern Slavery occurring, particularly in high risk industries and high risk countries. As part of our initiative to identify and mitigate risk in respect of our supply chain, we are continuing to implement and improve systems to identify and assess potential risk areas in our supply chains and to mitigate the risk of Modern Slavery and Human Trafficking occurring.

**4.5** All new suppliers are obliged to complete a due diligence questionnaire aimed at identifying modern slavery and human trafficking risks. Our standard contractual terms refer to MSA compliance and impose contractual controls on suppliers/third parties in this regard. These contractual controls are reinforced by our Anti-Slavery and Human Trafficking Policy, as well as the enhanced due diligence checks.

**4.6** As a result of the global pandemic caused by Covid 19, like all other businesses the University has had to implement considerable measures to ensure the utmost health and safety of its staff and students. This has involved the procurement of personal protective equipment, new signage, sanitising stations, hand gels etc., and also the purchasing of additional IT equipment to facilitate working from home for a large number of staff. Although the procurement was arranged at short notice, by necessity, the University used established frameworks to ensure that proper safeguards were in place before placing orders. In respect of the purchase of facemasks, the University used HE and Public Sector Frameworks for these requirements, therefore the procurement is Public Contracts

Regulations compliant, and due diligence has been undertaken prior to admitting suppliers to the frameworks. In respect of the purchase of new signage, sanitising stations, hand gels, PPE, IT equipment we used HE and Public Sector Frameworks and also the wider public sector frameworks available, including ESPO and CCS.

## **5. Due Diligence**

### **Identifying and assessing potential risk areas in our supply chains**

**5.1** In order to try and understand the risks we face from our global supply chain, we carry out monthly risk assessments of our suppliers. These cross-reference both country of origin and value of expenditure. We have devised a score card against which each supplier can be assessed using a scoring mechanism based on how countries are ranked on the Global Slavery Index. During 19/20 this assessment was carried out up to 31<sup>st</sup> January 2020.

**5.2** Based on the risk assessment carried out, and where contact has not been previously made, we contact our top 100 suppliers (by value of expenditure) each month, on a rolling basis, to make them aware of the University's commitment to, and to determine their response to the Modern Slavery Act and to encourage them to share the University's objectives to prevent Modern Slavery in their supply chains. We ask suppliers to complete a declaration to state their company's turnover, and whether they are fully compliant with the obligations under the Modern Slavery Act 2015. Suppliers are also asked to sign up to the NETpositive toolkit (see 5.3). During 19/20 no suppliers were contacted.

We have integrated supplier responses from the NETpositive toolkit (see 5.3) into our risk assessment to provide additional information, and also save links to transparency statements on web sites and to documents provided to us by suppliers, for example anti-slavery policies.

### **Supplier engagement**

**5.3** The University continues to subscribe to the supplier sustainability toolkit NETpositive. The toolkit enables suppliers to sign up and develop their own sustainability action plan. The tool addresses Modern Slavery risks, encouraging suppliers to develop a code of conduct and publish a Modern Slavery Transparency Statement.

## **6. Our Policies and Contractual Controls**

### **Finance**

**6.1** 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.

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

**6.3** 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.

**6.4** We are a Fairtrade University, committed to the Fairtrade aims of better prices, decent working conditions, local sustainability and fair terms of trade for farmers and workers in the developing world. The elimination of modern slavery is embedded in the Fairtrade Standards.

## **Research**

**6.5** 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**

**6.6** 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 mandatory training programme for those involved in recruitment to ensure compliance.

**6.7** 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.

**6.8** The University works in partnership with Unitemps (its subsidiary company LJMU Recruitment Agency Limited), through which it offers temporary work available within the University to its students and alumni. This ensures that temporary members of staff are treated fairly and consistently, and that appropriate safeguards are in place during the recruitment process. This has been used to support with the additional temporary staffing requirements that have arisen during the global pandemic, in particular the recruitment of safety marshals to assist with the movement of staff and students around campus.

## **Policies**

**6.9** We operate a Dignity at Work policy which sets out the University's commitment to protecting staff in their work place with the intention that all staff are treated fairly and consistently.

**6.10** Our Equality and Diversity Policy sets out the University's commitment to promoting equal opportunities for all those involved within the University community, whether staff,

students, visitors, contractors or clients. This commitment is to ensure that people's individual qualities are recognised and celebrated; and that people are treated with dignity and respect.

**6.11** 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.

**6.12** In 2019 we launched Respect Always! a collaboration between LJMU and JMSU which aims to get to the heart of what 'respect' means to us all as individuals and to collectively recognise this across the University. We have also produced the [Respect, Always! charter](#) which aims to demonstrate our commitment to putting respect at the heart of everything that we do.

## **7. Training**

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

**7.2** Our Finance staff receive regular training and updates on changes to the law.

**7.3** To ensure a high level of understanding of the risks of Modern Slavery and Human Trafficking in our supply chains the University offers two e-learning modules. The first module is a general training package and is available to all University staff. The training aims to raise awareness of Modern Slavery and outlines the University's obligations in addition to advising staff of the correct channels through which concerns can be raised.

**7.4** The second module is a bespoke training package, which is aimed at key University staff. This comprehensive training includes detailed case studies to inform staff of the different forms Modern Slavery can take. This has been targeted at Finance, Legal and Governance, International Relations and Research and Innovation Services staff. We have also encouraged the members of the Executive Leadership Team and the Board of Governors to undertake the training.

## **8. Raising awareness**

**8.1** We have a dedicated intranet page, which provides information to staff and students on the Modern Slavery Act and the actions the University is taking towards eliminating Modern Slavery and human trafficking from its supply chains. The website is updated on a regular basis to inform staff of the progress the University is making towards its Modern Slavery obligations.

**8.2** The University is a member of the Universities Studying Slavery (USS) consortium. USS is trans-Atlantic group of universities committed to researching and confronting institutional links to slavery, and the ways that slavery's complicated racial legacies have shaped university life. Since joining, the University has started a master's degree module

on Liverpool and slavery, on which students undertake individual research projects to interrogate Liverpool's ties to Transatlantic slavery. This research will be published at [liverpoolslavery.com](http://liverpoolslavery.com). There are currently 12 students on this course and 8 are undertaking this module.

**8.3** LJMU's Dr Daniel Silverstone, Director of the School of Justice Studies, delivered a series of national media interviews related to his research on human trafficking. Dr Silverstone spoke to Radio 4's [Today programme](#) about organised crime and the different types of human trafficking. (Listen from 2:43:10 to hear Dan's interview. The full feature starts at 2:38:55). He also produced a feature for [The Conversation](#) and gave an interview to [The Times](#) about people smugglers based in China acting as black-market "travel agents" for illegal migrants who enter the sex trade, work in drug cultivation or end up in forced labour in the UK.

More information about Dr Silverstone and his research is available [here](#).

**8.4** On 5<sup>th</sup> November 2019 LJMU Equality, Diversity and Inclusion (EDI) team worked in partnership with Savera UK to host an inspiring event concerning Honour Based Abuse, Female Genital Mutilation and Forced Marriage. The event was attended by staff and students from LJMU, other HEIs in the country and local community groups. The event helped to raise awareness, recognise the issues and how to speak out on behalf of people, and get help for oneself if in such situations. Speakers explained how these issues relate to other violence against women and girls.

**8.5** The University runs a CPD module 'Human Trafficking and Modern Day Slavery', which critically examines the issues involved in Human Trafficking and Modern Day Slavery. This includes studying the governing legislation and the processes around how cases are dealt with in the UK and from an international perspective, together with the link to organised crime. The programme also assesses the differences between human trafficking and people smuggling and the dilemma situations when offenders allege to be in slavery or when those perceived to be in slavery claim that they are experiencing a 'better life'.

## **9. Steps taken in Preventing Modern Slavery and Human Trafficking during 2019/20**

During 2019/20 we have continued to build on the work started in previous years 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 and continuing journey, as we raise awareness both within the University and with our partners and stakeholders. The progress we have made is summarised as follows:

- As part of the latest tender for the provision of fish and seafood for University catering, suppliers were required to have Marine Stewardship Council (MSC) accreditation or chain of custody certification. The supplier appointed has both MSC accreditation and has a modern slavery statement.
- On 1<sup>st</sup> September 2019 we became an affiliate member of Electronics Watch through NWUPC. Electronics Watch is an independent body who assist public sector organisations to ensure the rights of workers in the electronics industry are protected.
- All members of the University's Executive Leadership Team (ELT) and Board of Governors were registered to complete the University comprehensive modern slavery training module.
- Continued to provide an e-learning module targeted at frontline staff, providing comprehensive training, and detailed case studies.
- Continued to carry out supplier risk assessment, categorising supplier risk in the context of value of supply and country of origin using the Global Slavery Index (GSI) as a reference. (up to 31<sup>st</sup> January 2020)
- Continued to subscribe to the supplier sustainability toolkit NETpositive, which enables suppliers to develop a sustainability action plan which includes Modern Slavery.
- Reviewed our Anti-Slavery and Human Trafficking Policy, which is available on the University's web pages.
- Continued to embed Modern Slavery controls and requirements into our standard contracting processes.
- Continued to implement the Modern Slavery questionnaire as part of the new supplier and partner set up process, including drawing the attention of potential new partners to Government guidance on the MSA and to our Anti-Slavery and Human Trafficking Policy.
- We have updated our new supplier form to make this more user friendly following feedback from suppliers.

We have clear plans for the year ahead in terms of further steps we will be taking to mitigate Modern Slavery risk.

## 10. Assessment of Effectiveness in Preventing Modern Slavery and Human Trafficking

### 10.1 Reporting on KPIs

During 2019/20 we have engaged with suppliers from 59 countries, invoicing us with approximately £102 million of goods and services.

Total number of suppliers in 2019/20 = **3,574 (£102m)**

Number of suppliers identified as having modern slavery statements = **255 (£77.054m)**  
(figs to 31<sup>st</sup> January 2020)

Number of suppliers who have provided a declaration to state their turnover is less than £36m, but have signed to acknowledge they have read and understood the University's



Transparency Statement and Anti-Slavery Policy = 7 (£0.672m) (figs to 31<sup>st</sup> January 2020)

## Supplier Origins

Australia	Indonesia	Pakistan	Tanzania
Austria	Ireland	Panama	Thailand
Bangladesh	Israel	Poland	The Netherlands
Belgium	Italy	Portugal	Uganda
Brunei	Japan	Qatar	United Arab Emirates
Bulgaria	Jordan	Republic of Korea	United Kingdom
Canada	Kuwait	Russia	USA
Cayman Islands	Madagascar	Saudi Arabia	Zimbabwe
China	Malawi	Serbia	
Costa Rica	Malaysia	Singapore	
Czech Republic	Mexico	Slovakia	
Finland	Morocco	Slovenia	
France	Nepal	South Africa	
Germany	New Zealand	Spain	
Greece	Nigeria	Sri Lanka	
Hong Kong	Norway	Sweden	
India	Oman	Switzerland	

In our previous statements, we committed to report on the following key performance indicators. The table below details our progress:

Actions taken to strengthen supply chain auditing and verification	As part of the onboarding process we ask all new suppliers to provide information regarding their commitment to eliminating Modern Slavery and Human Trafficking and ask that where they are required to be compliant they provide evidence of this. We also require new suppliers to confirm they have read and understood LJMU's Modern Slavery transparency statement. Whilst 98% of our suppliers are based in the United Kingdom, we recognise that the remaining suppliers are scattered across the globe, and some are based in high-risk countries (as identified by the Global Slavery Index).
Steps taken to upskill any suppliers identified as "high risk", and assessing their ability to detect and mitigate Modern Slavery risk in supply chains	We have continued to use the supplier engagement toolkit NETpositive to help educate suppliers in respect of sustainability and specifically encourage suppliers to create an action plan for

	Modern Slavery and to publish a transparency statement.
Staff training levels	We provide two bespoke training courses, 'Understanding Modern Slavery' for all staff, and 'Modern Slavery - Awareness and Understanding' for key staff. To date 92% of staff have completed 'Understanding Modern Slavery' and 83% staff enrolled from Finance and other frontline departments have completed 'Modern Slavery - Awareness and Understanding'. The module 'Modern Slavery - Awareness and Understanding' has been rolled out to key staff in Finance, Legal and Governance, International and Research and Innovation Services, and also to our Executive Leadership team and Board of Governors.
Investigations undertaken into reports of Modern Slavery and remedial actions taken in response.	No instances of Modern Slavery have been discovered or reported in 2019/20.

**10.2** In order to assess the effectiveness of the measures taken by the University we will continue to review the key performance indicators identified above and reporting on them in our future Modern Slavery statements:

## 11. Our Plans for the Future

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

**11.2** 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 continue to carry out supplier and partner risk assessments and embed our MSA due diligence into the supplier and partner set up process.
- We will review and monitor supplier action plans through regular contract management and support initiatives to reduce the risk of Modern Slavery and Human Trafficking occurring.
- We will review and monitor supplier action plans developed through the NETpositive toolkit.
- We will continue to embed our Anti-Slavery and Human Trafficking Policy.
- We will continue to provide training for all key staff on MSA compliance, with a particular focus on the Human Resources Department and Academic Registry.

- We will continue to review and update all relevant policies and controls to embed MSA awareness.
- The University recognises that there is a significant risk of Modern Slavery and Human Trafficking within the construction industry, as identified by the International Labour Organisation. This, coupled with uncertainty around Brexit, which may lead to changes to EU worker's rights, and cost uncertainty following changes to the value of the pound, means the risk the University faces in this area is significantly high. With a number of high value construction projects either ongoing or due to start, we plan to map our risk and put steps in place to minimise these risks.
- The Universities Studying Slavery consortium was a first step towards exploring our history in this area. The University will develop a plan to set out how an 'LJMU and Slavery' project might progress.
- Our Chief Executive will write to all new partners and suppliers, setting out a statement of the University's core values (including the importance of robust anti-slavery measures) in order to set clear expectations for the conduct of the business relationship.

If you have questions about this statement, please contact Belinda McGuiness, Acting Finance Director ([b.mcguiness@ljmu.ac.uk](mailto:b.mcguiness@ljmu.ac.uk))

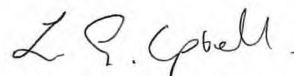
## Declaration

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

Signed



**Mr Mike Parker CBE**  
Pro-Chancellor & Chair of the Board



**Professor Ian Campbell BSc, MSc, PhD**  
Vice Chancellor and Chief Executive

This statement was approved by Liverpool John Moores University Board of Governors on 23rd November 2020.