

Modern Slavery & Human Trafficking Statement 2023/24

Introduction

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 2024 to prevent Modern Slavery and Human Trafficking in its business and supply chains.

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.

An estimated 49.6 million people were living in modern slavery on any given day in 2021. The largest estimated numbers of people in modern slavery are found in India, China, North Korea, Pakistan, Russia, Turkiye, Bangladesh and the United States.

Most of the countries with the lowest prevalence of modern slavery, Switzerland, Norway, Germany, Netherlands, Sweden, Denmark, Belgium, Ireland, Japan and Finland – are also members of the G20, yet even in these countries, with their high levels of economic development, gender equality, social welfare and political stability, as well as strong criminal justice systems' (GSI data), thousands of people continue to be forced to work or marry.

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 by significantly minimising the risk of slavery and human trafficking taking place in our supply chains or in any parts of our business.

Our Organisation, Structure and Supply Chain

Liverpool John Moores University is a UK Higher Education Institution, integral to the life of the city of Liverpool, with a global approach and footprint forging international partnerships to facilitate world-leading research and collaboration to tackle some of the huge global issues facing the modern world.

The University has two campus areas, Mount Pleasant and the City campus comprising thirty-one buildings. We are structured around five academic faculties supported by a Professional Services infrastructure.

As of 31st July 2024, the university had three subsidiary companies, all based in the UK:

- JMU Services Limited
- LJMU Recruitment Agency Limited
- The Liverpool Business School Limited

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

In respect of Modern Slavery, we have two main risk areas.

- **People:** we have a large population of staff (2,700) and students (23,526). We accord the welfare of staff, students, and visitors the highest priority. The vast majority of LJMU students are from the UK but we have a growing international population from many countries, particularly India. We work with external partners locally, nationally and globally on Research and Knowledge Exchange,
- **Supply chains:** we have a large and complex supply chain to support our academic activities and campus operations. We purchase a diverse range of goods and services and have more than 3,500 active suppliers from a multitude of sectors listed on our finance system. Regardless of what we buy we are committed to acquiring it in a responsible manner.

People and Place

Our strategy is for and through our people; both the staff and students who form our core community and the broader set of stakeholders, networks and communities of which we are privileged to be part. We will put people first in every part of our life as a university and strive to be a community to which they belong, of which they are proud, and in which they are supported and empowered.

We provide training to all our staff to increase their awareness of modern slavery and human trafficking so they're able to understand, identify and report on these risks. We are committed to maintaining an honest and ethical culture, ensuring our staff are aware of our anti-bribery policy and zero-tolerance approach to bribery and corruption. We also have a whistleblowing policy,

The University is deeply embedded in its place. It educates the nurses, police, teachers and pharmacists of tomorrow, works with business and industry to support the local and regional economy, and is written into the fabric of the city and local communities through a wide range of collaborations and connections. We are committed to contributing our knowledge to partnerships and projects that will accelerate economic recovery, positively impact the climate emergency, enhance the prospects of places and communities, and build the skills required for the region and its people to look to the future with confidence. Given its history as a major port, Liverpool's sense of place also has a global inflection, and the University has a growing international dimension across its activity base. We are committed to augmenting our visibility as a student destination and education partner, to supporting the interests of the city and region through our global connections and influence, and to forging research

collaborations across the world that help to build economies, reduce poverty and enhance health and education outcomes.

LJMU Structure of Corporate Governance

Our corporate governance structure detailed here on our website [Governance and charitable status | Liverpool John Moores University \(ljmu.ac.uk\)](https://www.ljmu.ac.uk/governance-and-charitable-status).

Our Policies and Processes relating to Slavery and Human Trafficking

Our approach to the issue of modern slavery is consistent with our civic origins and our values. Our internal policies and processes support this.

- We have had an Anti-Slavery and Human Trafficking Policy in place since 2017.
- 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. The Ethical Investment Policy, Procurement Strategy, and Financial Due Diligence Process are all set within that Framework.
- We have a Safeguarding Policy owned by the PVC of Student Experience which is intended to support the safeguarding of any child, young person or vulnerable person who is part of, or comes into contact with, the university community.
- 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.
- We regularly review our procurement documentation and processes to ensure they reflect best practice. Social value criteria are included in our tendering exercises and all LJMU tender documents encompass Modern Slavery Statements which suppliers are required to sign up to.
- We have established a Climate Change Panel, which has produced a Climate Change Action Plan which addresses inequalities in the supply chain.
- As of 2023 we introduced a Sustainable Procurement Policy, and a Food Policy. The Sustainable Procurement Policy was updated in 2024 to include expanded social value considerations.
- We have a comprehensive Recruitment Policy and mandatory training programme for those involved in recruitment to ensure compliance. All line managers attend the Recruitment and Selection LEAD training module prior to any recruitment, which is carried out by HR Business Partner's. The Recruitment and selection policy was updated in March 2024.

- The Sustain code of conduct is currently included in all our Tender documentation. All suppliers must subscribe to this.
- Modern Slavery Act clauses are included in all LJMU procurement contracts.

Our Approach to Understanding and Managing Risk of Modern Slavery

As outlined above the two main risk areas for the university in terms of slavery and trafficking relate to people and supply chains.

In terms of people, we continue to integrate the consideration of modern slavery risks into our wider risk management framework.

- We have formalised our internal governance of this risk at the highest level: Pro-Vice-Chancellors of each academic area and the Executive Leadership Team (ELT) lead of each of the business services divisions is 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.
- 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.
- The university has a subsidiary company LJMU Recruitment Agency Limited (LJMURA), a franchise of Unitemps, through which it offers temporary work to LJMU students and alumni providing work experience opportunities and supporting students' financial sustainability whilst studying. At the point of recruitment, appropriate checks on prospective employees are completed in accordance with the law. LJMU utilises LJMURA for temporary staffing requirements.
- LJMU continue to put in place relevant processes and systems to help identify and assess potential risk areas within its organisation activity and supply chains relating to Research and Knowledge Exchange activities. The University's contractual documentation includes obligations regarding compliance with modern slavery legislation as well as the right to terminate in the event of a breach of these obligations.

In terms of the supplier risks.

- We continue to work on understanding our supply chain. 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. We are continuing to implement and improve systems to identify and assess potential risk areas in our supply chains. We have in excess of 3,000 live suppliers listed on our Finance System and

continue to data cleanse every 12-months. Cleaner data enhances our ability to more effectively manage and monitor our supplier base and reduces the risk in terms of modern slavery). The majority of spend is with 500 suppliers (with spend of £10k or more), with whom we either contract directly or through a public procurement framework agreement. Whether we procure directly or through a public procurement framework agreement, suppliers are subject to a full selection process (UK Government Cabinet Office – SQ used), which evaluates their capacity and capability to supply, and includes assessments of, amongst other things, their supply chain practices and adherence to modern slavery legislation.

For suppliers contracted through public procurement frameworks high level contract management is undertaken by each letting authority. This includes monitoring company capability and capacity, as well as general reviews of their wider business practices to provide necessary assurance to contract users. We work closely The Northwest Universities Consortium (NWUPC) and The University Catering Organisation (TUCO). To manage risks through their contract management processes both these consortia have incorporated physical supplier visits for UK based companies within their contract management practices. These include a visual inspection of the premises including looking for any signs of slavery, this provides assurance that working practices meet our expectations.

- During 2023/24 we have continued 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. Each supplier is encouraged to share with us details of the impacts arising from their business activities, including the risk of modern slavery in their supply chains and to tell us how they are addressing these risks.
- Since September 2019, the university has been an affiliate member of Electronics Watch through NWUPC. Electronics Watch is an independent body which assists public sector organisations to ensure the rights of workers in the electronics industry are protected.
- We are committed to ensuring that people are paid appropriately for the work that they undertake. In March 2016, we became the first university in Liverpool, and the largest employer in Liverpool, to be accredited as a Living Wage employer.

Staff Training and Promoting Awareness of Slavery and Human Trafficking

We remain committed to raising awareness of modern slavery amongst staff.

- To ensure a high level of understanding of the risks of Modern Slavery and Human Trafficking in our supply chains the university requires all staff to undergo

an e-learning module on Modern Slavery renewable every three years. 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.

- The university has a second, more comprehensive, e-learning module which 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.
- 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.
- The delivery of Finance Clinics which commenced in 2021/22 these are held throughout the year with LJMU Faculties. Within these clinics, we re-iterate LJMU Financial Regulations including regulations around the purchase of goods and services. We reinforce the importance of supplier selection and consideration of wider factors (beyond price) when engaging with a company.
- Our Procurement Team (those involved in tendering and engagement of suppliers) are professionally qualified (MCIPs).

Steps taken in Preventing Modern Slavery and Human Trafficking during 2024/25

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 below:

- The continuation of the use of e-Learning modules to deliver mandatory training to staff on the Modern Slavery and Human Trafficking.
- We continued to embed Modern slavery controls and requirements in our standard contracting and partnership processes.
- The continued delivery of Finance clinics across the university as described above.
- Implemented a Sustainable Procurement Policy which states all procurement undertaken by the University is performed ethically, sustainability and in compliance with relevant legislation and regulation. The policy is mandatory for all staff of the University and its wholly owned subsidiaries (including temporary and agency individuals). Contractors to the University and other

University agents are also expected to comply.

- Development of Business Intelligence reports to facilitate the reporting on and management of our supplier base.
- We continue to monitor active suppliers and cleanse these every 12-months. Cleaner data enhances our ability to more effectively manage and monitor our supplier base and reduces the risk in terms of modern slavery.
- We continue with IT developments to allow us to more effectively categorise our suppliers to allow more effective category management, this will enhance our ability to monitor the risk of modern slavery.

Understanding Our Supplier Base

During 2023/24 we purchased or accrued approximately £93m of goods, services and works through various supply chain arrangements. We have engaged with 3,194 suppliers from 66 countries and territories (including the UK). The information pertaining to rankings and prevalence has been taken from the Walk Free Global Slavery Index - [Here](#). The spend in the high-risk countries pertains to International Recruitment activity.

Spend by Country not including UK - Key - Green Low Risk, Red High Risk

Country	Value £	Global Slavery Total Vulnerability Rank 2024 %	Prevalence Rate
Algeria	£513.32		
Austria	£1,834.00		
Australia	£206,196.26		
Austria	£18,205.00		
Bahrain	£5,720.00		
Bangladesh	£21,463.95		
Belgium	£31,632.27	154	1
Botswana	£7,442.00		
Brazil	£27,781.14		
Brazil	£2,000.00		
Brunei Darussalam	£23,155.00		
Bulgaria	£3,600.00		
Canada	£41,718.90		
China	£378,707.87		
Colombia	£65,832.50		
Columbia	£23,835.00		
Czech Republic	£15,102.99		
Denmark	£15,993.24		
Egypt	£21,162.00		
Eire	£32,598.59	153	1.1
Estonia	£1,140.00		
Finland	£1,500.00	151	1.4
France	£122,612.82		
Germany	£150,408.41	158	0.6
Gibraltar	£2,017.98		
Greece	£6,766.09		
Guatemala	£25,000.00		
Hong Kong	£4,372.12		
Iceland	£42,492.10		
India	£544,622.37		
Indonesia	£73,075.00		
ISRAEL	£2,200.00		
Italy	£61,283.10		
Japan	£10,756.28	152	1.1
Jordan	£164,263.66		
Kenya	£6,486.00		
Malawi	£23,770.08		
Malaysia	£125,641.33		
Morocco	£23,375.00		
Myanmar	£2,490.00		
Nepal	£72,306.61		
New Zealand	£4,300.28		
Nigeria	£168,766.45		
Norway	£9,999.60	159	0.5
Pakistan	£7,223.18		
Poland	£737.68		
Portugal	£13,020.29		
Qatar	£4,810.82		
Republic of Korea	£12,680.00		
Romania	£9,479.60		
Saudi Arabia	£7,694.15	4	21.3
Seychelles	£7,985.00		
Singapore	£22,191.44		
Slovakia	£2,135.00		
Slovenia	£2,255.34		
South Africa	£17,116.00		
Spain	£217,023.90		
Sri Lanka	£175,030.00		
Sweden	£212,589.07	156	0.6
Switzerland	£50,754.43	160	0.5
Thailand	£27,761.00		
The Netherlands	£67,864.11		
Turkey	£27,649.39	5	15.6
United Arab Emirates	£11,287.61	7	13.4
USA	£939,135.36		
Vietnam	£76,920.00		
Total	£4,507,482.68		

Spend By Faculty / Service Team

The LJMU Service Teams / Faculties with the highest spend are:

- Estates – majority of spend is via public framework agreements, which include Pagabo and Crown Commercial Services
- IT Services - majority of spend is via public framework agreements, in the main via HE Purchasing Consortia, and Crown Commercial Services
- Registrar and Chief Operating Officer – majority of spend is via public framework agreements, which consist of HE purchasing consortia: Crown Commercial Services, TUCO and ESPO
- Faculties
 - Faculty of Science
 - Faculty of Engineering and Technology

During 2025 there will be a restructure of the Faculties, condensing to two Faculties from five.

The majority of spend is via HE Frameworks – for requirements such as gases/chemicals/ lab equipment etc.

Key Performance Indicators

Key Performance Indicator	2022/23 Measure
Staff trained on modern slavery risks	All new staff have training
Known modern slavery cases in our direct areas of influence	0
Suppliers engaged with directly on modern slavery (email, phone, or face to face)	All suppliers engaged indirectly via terms and conditions, and self-declaration within the new supplier form.
Collaboration with others	Electronics Watch – HE and Public Purchasing Consortia
Sustain code of conduct	Included in all tender exercises

Our Plans for the Future

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.

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 continue to develop our management information reports via Power BI. Spend by category and country is a key report identified to further assist in identifying high risk areas.
- 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 continue to embed our Anti-Slavery and Human Trafficking Policy.
- Our University Strategy is for and achieved through our people, both the staff and students who form our core community and the broader set of stakeholders, networks and communities of which we are privileged to be part. We will put people first in every part of our life as a university and strive to be a community to which they belong, of which they are proud, and in which they are supported and empowered.
- We will continue to provide training for all key staff on MSA compliance.
- We will continue to review and update all relevant policies and controls to embed MSA awareness.
- The Sustain code of conduct is currently included in all our Tender documentation and we are retaining this requirement on a permanent basis. All suppliers must subscribe to this. The Code of Conduct will be placed on the LJMU external website and referenced in the new supplier form.
- Engagement with Faculties and Professional Service regarding Financial and Procurement matters will continue, and content is constantly being developed.
- The Head of Procurement continues to be a member of the HEPA Responsible Procurement Group, and the sub-group for Social Value. Membership of these groups will benefit LJMU as working with other HEIs to evolve and improve in this area.
- LJMU is a key partner in working towards the Liverpool City Region's target to be net carbon by 2040. We plan to adopt the Net Carbon model in early 2025.
- In our quest for Net Zero by 2035, we are continuing with the five working groups, these include Community Engagement, Teaching, Campus Management, Leadership & Governance and Research. These groups embody Sustainability (both environmental and social factors) and will further embed The Anti-Slavery and Human Trafficking policy.
- The Head of Procurement, Head of Legal, Procurement Manager and Solicitors at LJMU will have undertaken the Procurement Act 2023 Modules

by early 2025 – in which there is a heavy focus on assessing risk, due diligence, debarment and Social Value.

- We will positively engage in research, knowledge exchange, partnerships and collaborations aimed at tackling modern slavery and promoting a shared culture of best practice.

Declaration

This statement was approved by Liverpool John Moores University Board of Governors on 25 November 2024

Signed



Mike Parker CBE
Pro-Chancellor & Chair of the Board



Professor Mark Power
Vice Chancellor and Chief Executive