



NEUPC Slavery and Human Trafficking Statement Review Period May 2024-2025

Introduction

The following statement is made on behalf of NEUPC Ltd (“NEUPC”) in acknowledgement of section 54(1) of the Modern Slavery Act 2015 (the “Act”) and constitutes its slavery and human trafficking statement.

This statement sets out the steps that NEUPC has taken, and plans to take, to address the issues of Modern Slavery, human trafficking, forced and bonded labour and labour rights violations in our supply chains.

Although NEUPC has an annual turnover considerably less than the threshold required to publish a statement under the Modern Slavery Act 2015, the combined annual spend through its framework agreements by member institutions warrants a statement and demonstrates our commitment to responsible procurement. In addition, NEUPC recognises that member institutions place reliance on NEUPC acting in a responsible and ethical manner which assists them in awarding contracts from framework agreements which include Modern Slavery due diligence as part of the procurement process. In the financial year ending 31st July 2023, NEUPC members spent over £285m through collaborative agreements. This provides an excellent opportunity to make a positive impact through the implementation of our Responsible Procurement and Social Value responsibilities. NEUPC acts ethically in all commercial relationships and enforce effective processes to identify, prevent and mitigate the risk of slavery and human trafficking taking place in any part of its supply chains or in the undertaking of its operations.

Organisational Structure and Supply Chains

NEUPC is one of 6 UK Higher Education and 2 specialist purchasing consortia, known as UK Universities Procurement Consortia (“UKUPC”), established to deliver and manage a wide range of collaborative framework agreements within the higher and further education sector.

NEUPC is governed by a Board of Directors (“the Board”), comprising representatives from different disciplines within member institutions, which focuses on the strategic direction and financial well-being of the organisation. The Procurement Strategy Group (“PSG”), made up of Heads of Procurement from member institutions, focuses on procurement strategy and collaborative procurement. PSG meets to explore sector matters and to provide direction for the future contracting strategy. PSG act as an informing body for the Board and Management of NEUPC in performing their roles.

NEUPC leads collaborative tendering activity on behalf of its members by establishing framework agreements across a range of categories, led by the NEUPC Category Managers and the Management Team. NEUPC also provides a shared service facility to support organisations through the provision of a part-time procurement resource. Additionally, NEUPC teach Chartered Institute of Purchasing and Supply (CIPS) professional qualifications and procurement apprenticeships.

Our framework agreements fall under the following category areas:

AV and Broadcast	Estates and Construction
Furniture	IT and Telecoms
Office Supplies	Postal and Courier Services
Professional Services	Soft Facilities Management
Stem-Ed and Laboratories	Travel

Our own direct supply chain is relatively small and dedicated largely to provision of services related to running our office (rent, utilities, stationery, IT support, accounting services) and occasional business travel, with suppliers, who are all based in the United Kingdom.

NEUPC Policies

We work collaboratively to improve sustainable procurement practices within the HE Sector. We are committed to supporting the [United Nation’s Sustainable Development Goals](#) and pursuing ethical and responsible procurement practices.



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As a member of UKUPC, and using the combined power of both members and consortia, increases the likelihood of identifying and acting on issues. NEUPC also participate and contribute to the UKUPC National Responsible Procurement Group and the re-established Higher Education Procurement Association (HEPA) which comprises member representation from across the UK, which focuses on Modern Slavery and sustainability issues and developing responsible procurement strategy, initiatives and developing best practice guidance.

Our Responsible Procurement and Social Value Policy outlines NEUPC's approach to responsible procurement and enhances its social value focus in line with the UK Governments 2020 [Social Value Model from PPN 06/20 and subsequent PPN 02/23](#), in particular the key theme of Equal Opportunity that is specifically focused on methods for identifying and managing the risks of Modern Slavery.

The NEUPC Policy focuses responsible procurement as one of seven objectives with specific measures that NEUPC will strive to excel and meet the vision "Ensure effective procedures are in place to promote and monitor Human Rights and aim for the eradication of slavery and forced labour throughout all influenceable tiers of our supply chains. Request suppliers Modern Slavery statements are compliant, and work with any suppliers who are below compulsory publication thresholds to create one or acknowledge the Modern Slavery Act 2015".

Our Whistleblowing Policy encourages NEUPC employees to report any form of wrong doing they feel uncomfortable with, which could include abuses of human rights, including Modern Slavery and human trafficking.

Anyone external to the NEUPC can report any concerns regarding the framework agreement supply chains directly to the [Category and Responsible Procurement Manager](#).

The NEUPC will treat all disclosures consistently and fairly, and take all reasonable steps to maintain the confidentiality of the whistleblower where it is requested (unless required by law to break that confidentiality).

The Equal Opportunities Policy covers recruitment and respectful and tolerant relationships with fellow employees and other business relationships. Complaints may be handled through the Grievance Procedure and breaches of the policy may lead to disciplinary proceedings.

Due Diligence Processes - Including Risk Assessment and Management

Modern Slavery is an integral part of our Strategy and wider Responsible Procurement objectives set out to deliver positive and measurable benefits and elimination of Modern Slavery. We aim to demonstrate continuous Responsible Procurement improvements and reduce the impacts from our frameworks.

In 2017, NEUPC invested in and continue to use of the [NETpositive Futures](#) Supplier Engagement tool, which we use to regularly monitor, review, and ensure continuous improvement to combat slavery and human trafficking in our supply chains. The tool allows NEUPC to:

- Establish a single mechanism to engage contracted suppliers with the issues of Modern Slavery.
- Allows NEUPC as a consortium to offer support and guidance to our supply base and share best practice.
- Allows NEUPC to track the actions being taken and progress being made by our supply chain in addressing aspects of Modern slavery.

In 2019, NEUPC redeveloped procurement processes and templates to ensure sustainability was effectively embedded and Modern Slavery risks could be clearly identified and monitored. This includes:

- New sustainability section within tender documentation including a specific clause on Modern Slavery and mandatory supplier registration with NETpositive on appointment.
- Sustainability question bank developed with targeted Modern Slavery questions.
- Annual reminder for suppliers to submit their Modern Slavery Review Statement as part of the Supplier Self-Assessment Questionnaire.



In 2020, NEUPC embed responsible procurement considerations including Modern Slavery focus into its full procurement cycle. In mapping its processes to ISO20400:2017, NEUPC then undertook an independent assessment to confirm effective compliance which was successful. The Assessor noted *“Against the ISO20400 Guidance NEUPC has demonstrated a clear commitment and excellent practice on sustainable procurement.”* The Assessor also notes *“it is also clear that since NEUPC achieved Level 4 of the Flexible Framework in 2017 significant progress has been made on systems and processes as well as clear leadership, which indicates that NEUPC is clearly operating at Level 5 of the Flexible Framework.”*

NEUPC rolled out a code of conduct to Suppliers in August 2021 in line with UKUPC consortia to further influence HE Framework Suppliers to ensure they undertake responsible procurement themselves and work towards reducing ethical and environmental issues within their supply chain, including forced labour and Modern Slavery.

During August 2022, NEUPC become members of Electronics Watch. An organisation which helps help public sector organisations to work together, and collaborate with civil society monitors in production regions, to protect the rights of workers in their electronics supply chains.

Pre-Tender

When undertaking procurements, our Category Managers undertake risk analysis and sustainability impact analysis to assess the risk of Modern Slavery and wider environmental issues which can be found within each procurement sourcing strategy.

Recognised high-risk category areas that NEUPC leads tendering activity on are:

AV and Broadcast	Estates and Construction
Furniture	IT and Telecoms
Stem-Ed and Laboratories	Soft Facilities Management

As a member of Electronics Watch we are able to build Electronics Watch labour standards clauses into our contracts for IT hardware.

Tender Assessment / Appointment to Framework Agreements

We require that Modern Slavery statements/policies, where required (over £36m turnover), are made available.

For high risk areas, supplier’s actions to monitor and manage the risk of Modern Slavery in their supply chains is included in the tender assessment.

As part of NEUPC’s ISO20400 Continuous Improvement Plan and focus on the ‘Equal Opportunities’ theme, it is conditional that suppliers demonstrate their commitment to responsible / sustainable procurement within their organisation and supply chain by signing the Sustain Supply Chain Code of Conduct, and produce their organisation’s Sustainability Action Plan via the NETpositive Futures supplier engagement tool as a condition of appointment to frameworks.

Contract Management

Thereafter, sustainability and Modern Slavery risks are continually monitored through contract management via the contract risk register and [NETpositive Futures](#) sustainability supplier engagement tool, and using compliance reports from Electronics Watch monitoring organisations on factories which manufacture IT products ultimately supplied to the consortia members.

The engagement tool has been recently updated, and suppliers need to update their settings and responses to questions. In March 2024 291 suppliers are shown as registered. 53 suppliers have turnover greater than £36m and have published a Modern Slavery Statement, 47 are below the financial threshold but have chosen to publish a Modern Slavery Statement. 145 suppliers report no incidents of Modern Slavery being identified, and 2 suppliers have reported incidents but that they have since resolved the situation.

Our strategy has specific supplier targets which we will monitor and report.



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Training and Guidance on Modern Slavery and Trafficking

Employee induction training makes our commitment clear to eliminating Modern Slavery from our supply chains. This statement is read by all new employees as part of their induction.

Since 2020 NEUPC staff involved in procurement undertake the CIPS Ethics e-learning test to retain the CIPS corporate Ethics Certificate and being listed on the [Corporate Ethics Register](#) CIPS [Corporate Ethics Register](#).

Additionally, new employees are encouraged to complete HEPA e-learning modules including 'A guide to Modern Slavery' and 'Protecting Human Rights in the Supply Chain'. All members of staff have undertaken training using the NETPositive tool.

Since July 2020, UKUPC consortia have collaborated on developing tools and guidance for suppliers and developing a more common approach to responsible procurement. In April 2021, the UKUPC published a guide to writing a Modern Slavery statement for HE suppliers (https://www.ukupc.ac.uk/pdf/Modern_Slavery_guidance_for_suppliers.pdf) and a series of presentations (<https://www.youtube.com/playlist?list=PLMOmqpQF4oH8xqyOFNZIC4PUCsDzpdCYj>) covering the Modern Slavery Act and reminds suppliers of their obligations under the Act and HE sector expectations.

UKUPC also developed model tender questions and evaluation criteria based on the UN SDG's for use by university staff, which includes Modern Slavery.

Our member conferences have included seminars on Using Social Value Clauses in tender evaluations, and social value to help delegates explore the importance and the practicality of including and scoring ethical criteria within the tender process.

NEUPC Future Plans

NEUPC plans to:

Encourage suppliers to publish their Modern Slavery statement on the Home Office database.

Rollout use of the Government's Modern Slavery Assessment Tool (MSAT) on framework agreements identified as highest risk for Modern Slavery.

Focus on deeper supplier development and engagement to start collecting data on HE supply chains, eg commodities and country of manufacture, to enable NEUPC to have greater knowledge of the supply base beyond tier 1 and any potential issues or concerns.

Increase the number of contracted suppliers that have updated their settings and action plans on the NETpositive Futures supplier engagement tool

This statement was approved by the NEUPC Board on 9-5-24 and will continue to be reviewed on an annual basis.

Signed by: 

Name and Position: Frank Rowell MCIPS

CEO NEUPC

Any queries relating to this statement should be directed to:
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