



## NEUPC Modern Slavery Statement

### 1. Modern Slavery Policy

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.

### 2. 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”) for the financial year ending 31st July 2024

Although NEUPC has an annual turnover far less than the threshold required to publish a statement under the Act, NEUPC believes that the annual total spend through its framework agreements by members warrants a statement and demonstrates our commitment to responsible procurement. In addition, NEUPC recognises that members place reliance on NEUPC, to act in a responsible and ethical manner and include Modern Slavery due diligence as part of the procurement process, to assist them in awarding contracts from framework agreements. This statement sets out the steps that NEUPC has taken, and plans to take, to address the issues of Modern Slavery in our supply chains.

### 3. Organisational Structure and Supply Chains

NEUPC is a non-profit-making Higher Education (“HE”) procurement consortium, one of six UK Higher Education and two specialist procurement consortia, collectively known as [UK Universities Purchasing Consortia](#) (“UKUPC”).

NEUPC has a number of separate bodies to oversee and manage its activities:

- The [Board of Directors](#) (“the Board”) focuses on the strategic direction and financial well-being of the organisation.
- The Procurement Strategy Group (“PSG”) focuses on procurement strategy and collaborative procurement, and act as an informing body for the Board and Management Team of NEUPC in performing their roles.
- The [NEUPC team](#) deliver the procurement and contract management activity, and provide resources as a shared service to support NEUPC member’s own procurement activity.

NEUPC framework agreement categories cover:

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

### 4. NEUPC Policies

Our Responsible Procurement and Social Value Policy (the “RPSV Policy”) includes the objectives related to Modern Slavery of:

- 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.

and



- 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.

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.

### 5. Due Diligence Processes - Including Risk Assessment and Management

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.

In the financial year, NEUPC members spent over £275m through collaborative agreements with 380 suppliers, 258 on agreements managed by other consortia and 122 on agreements managed by NEUPC. This provides an excellent opportunity to make a positive impact through the implementation of our Responsible Procurement and Social Value Policy.

NEUPC considers a range of factors (eg category, sector, location, vulnerable groups and types of work) when assessing supply chain risk for Modern Slavery. Using the Higher Education Procurement Association (HEPA) Commodity Risk Analysis Tool, and other available sources of information, we continue to update our risk analysis and adjust due diligence efforts accordingly. Recognised higher-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

We work collaboratively across UKUPC and [HEPA](#) to improve sustainable procurement practices within the HE Sector, to focus on sustainability issues and develop responsible procurement strategy, initiatives and best practice guidance, using the combined power of both members and consortia, and increase the likelihood of identifying and acting on issues.

When undertaking procurements, to consistently consider Modern Slavery and embed risk management into the procurement process, our Category Managers follow the process:

#### 5.1 Pre-Tender / Tender

Consider the risk of Modern Slavery when completing a sustainability impact analysis and/or risk analysis when preparing the procurement sourcing strategy.

Incorporate relevant Modern Slavery requirements into the specification, assessment questions/weightings, and contract performance clauses where possible. Bidders are requested to confirm acceptance of UKUPC Framework Agreement and Call-Off Model Terms and Conditions when responding to invitations to tender, both of which include clauses for compliance with anti-slavery and human trafficking laws and policies. As a member of Electronics Watch we are able to build Electronics Watch labour standards clauses into our contracts for IT hardware.

For higher risk areas, assess supplier’s actions to monitor and manage the risk of Modern Slavery in their supply chains irrespective of their turnover.

## 5.2 Appointment to Framework Agreements

Upon appointment to NEUPC framework agreements we request suppliers:

- acknowledge and demonstrate their adherence with the principles of the [Sustain Supply Chain Code of Conduct](#) (the "SCCoC") with respect to their organisation and supply chain.

and

- produce their organisation's Sustainability Action Plan via the [NETpositive Futures Supplier Engagement HE Tool](#) ("SEHE Tool"), that includes a section/questions related to Modern Slavery.

## 5.3 Contract Management

Modern Slavery risks are monitored through contract management in line with category strategies and contract performance/clauses agreed under the framework, using resources such as the SEHE Tool, the Modern Slavery Assessment Tool ("MSAT") from the Home Office, and monitoring/compliance reports from Electronics Watch for IT frameworks.

NEUPC will work collaboratively with the supplier to address instances of Modern Slavery identified following an agreed remedial action plan, including encouraging victims of Modern Slavery to seek support. Actions to take can differ depending on the supplier's size/resources, ability to influence the supply chain, suspected victims willingness to participate in any process etc. Suppliers should only be removed from framework agreements and/or contracts terminated as a last resort.

No Modern Slavery incidents have been identified or reported in the year.

## 6. Reporting Concerns/Issues

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

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).

if they prefer, or they are a potential victim requiring support, concerns can be reported via a first responder organisation, eg the [UK Modern Slavery & Exploitation Helpline](#) or the [Salvation Army confidential Referral Helpline](#)

## 7. Training and Guidance on Modern Slavery

NEUPC staff involved in procurement:

- undertake the CIPS Ethics e-learning test annually to retain the CIPS corporate Ethics Certificate and maintain NEUPC being listed on the CIPS Corporate Ethics Register.
- read this statement annually when updated/published, and by new employees as part of their induction.
- can access training from and guidance from NETpositive Futures and/or the Category and Responsible Procurement Manager re using the SEHE Tool.

UKUPC have published a guide to writing a Modern Slavery statement for HE suppliers ([https://www.ukupc.ac.uk/pdf/Modern\\_Slavery\\_guidance\\_for\\_suppliers.pdf](https://www.ukupc.ac.uk/pdf/Modern_Slavery_guidance_for_suppliers.pdf)) and a series of presentations

(<https://www.youtube.com/playlist?list=PLMOMqPQF4oH8xqyOFNZ1C4PUCsDzpdCYj>)

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 consideration to use by university staff, which includes Modern Slavery.

NEUPC's Category and Responsible Procurement Manager is available to members for guidance and support with their Modern Slavery Statements.

### 8. NEUPC Future Plans

NEUPC will continue 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

### 9. KPIs

Training and guidance	NEUPC staff involved in procurement passing the CIPS Ethics e-learning test	100%
	NEUPC staff involved in procurement have read the MS statement	100%
Supply Chain Transparency and Supplier Development	Percentage of 'active' NEUPC framework suppliers that have completed/updated the SEHE Tool in the previous 12 months (20% at 31/7/2024)	50%
	Number of NEUPC framework suppliers who have completed the MSAT	20
	Framework agreements with Tier 1 & 2 supply chain mapped	2

This statement was approved by the Board on 13<sup>th</sup> February 2025 and will continue to be reviewed on an annual basis.

Signed by:

Name and Position: Rebecca Baxter, Managing Director

Date: 13<sup>th</sup> February 2025