



North Eastern Universities
Purchasing Consortium

NEUPC Slavery and Human Trafficking Statement Review period February 2019-2020

Introduction

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

This annual statement sets out the steps that NEUPC has taken during the review period, and those that they intend 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 far less than the threshold required to publish a statement under the Modern Slavery Act 2015, NEUPC believes that the total spend through its framework agreements annually 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 members in developing contracts from framework agreements which have already included modern slavery due diligence as part of the procurement process. NEUPC acts ethically in all commercial relationships and enforce effective processes to ensure that slavery and human trafficking is not taking place in any part of its supply chains or in the undertaking of its operations.

Organisational structure and supply chains

North Eastern Universities Purchasing Consortium Ltd (NEUPC) is one of six UK Higher Education purchasing consortia 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 comprising representatives from different disciplines in member institutions and focuses on the strategic direction and financial well-being of the organisation. The Procurement Strategy Group made up of Heads of Procurement from member institutions focuses on procurement strategy and collaborative procurement.

NEUPC leads collaborative tendering activity on behalf of its members by establishing framework agreements across a range of categories, led by 5 FTE NEUPC Category Managers, as identified in the organisation structure <http://neupc.ac.uk/about-us>. NEUPC also provides a shared service facility to support organisations through the provision of a part-time procurement resource. NEUPC also provides procurement training, CIPS qualifications and procurement apprenticeships to support member institutions with the development of professional and ethical procurement skills.

Our Supply Chains 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



North Eastern Universities
Purchasing Consortium

NEUPC also facilitates a regional focus group for Responsible Procurement concerned with developing responsible procurement initiatives and developing best practise guidance. The Responsible Procurement Group and the Category Managers are supported by 0.5FTE NEUPC Responsible Procurement Manager appointed in July 2018.

NEUPC also engages on modern slavery and sustainability issues with fellow HE consortia and the wider university sector through the Higher Education Procurement Association ([HEPA](#)) and the HEPA National Responsible Procurement Group

NEUPC Policies

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

Our [Responsible Procurement Strategy and Action Plan](#) published in April 2019 outlines NEUPC's approach to responsible procurement and led to a systematic review of processes, tools and templates to ensure that responsible procurement and risk considerations are embedded in everything NEUPC undertakes.

[NEUPC Strategy 2019-2022](#) focuses responsible procurement as one of four major goal areas that NEUPC will strive to excel in to meet the vision of being "the best collaborative partner that supports the procurement needs of our members"

NEUPC's Whistle-blowing policy allows and encourages staff to use internal mechanisms for reporting any malpractice, fraud or illegal act, omissions or unethical practise which could include abuses of human rights, including modern slavery and human trafficking.

NEUPC has an Equal Opportunities policy which 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

Each Category Manager undertakes a risk analysis and sustainability impact analysis of their Category area and supply chains in order to assess the risk of modern slavery and wider environmental issues which can be found in the individual category strategy which is a living document and is regularly updated. This is further refined when developing sourcing strategies for individual commodities and tender documentation. Thereafter, sustainability and modern slavery risks are continually monitored through contract management via the contract risk register and NEUPC's sustainability supplier engagement tool, [NETpositive](#).

Effective action taken to address modern slavery

In 2019, NEUPC redeveloped their procurement processes and templates to ensure sustainability was effectively embedded and modern slavery risks could be clearly identified and monitored. This included

- New sustainability section in tender documentation including a specific clause on modern slavery and mandatory supplier registration with NETpositive on contract award.
- All sourcing strategies to be reviewed by the Responsible Procurement Manager
- A minimum 10% sustainability weighting in tender evaluation criteria



North Eastern Universities
Purchasing Consortium

- Whole life contract risk register
- 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.
- Utilise Electronics Watch clauses in relevant tenders.

In 2017, NEUPC invested in the use of the NETPositive 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 consortia 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.
-

80% of NEUPC Framework suppliers have signed up to NETpositive by the end of December 2019 and of those 219 suppliers, 100% have confirmed that they are aware of the Modern Slavery Act and 72% have confirmed that they have made a public commitment to Modern Slavery. 57% of NEUPC suppliers with action plans on NETpositive confirm that they engage with their own suppliers on Modern Slavery and 50% engage in Modern Slavery training within their organisations.

Training on Modern Slavery and Trafficking

In March 2019, NEUPC's Annual Conference featured a seminar on Using Social Value Clauses in Tender Evaluations, to help delegates explore the importance of sustainable considerations – and the practicality of including and scoring ethical criteria – in the tendering process. In May 2019, NEUPC hosted and facilitated a full-day CPD session for NEUPC members, focusing on how to embed responsible procurement in the purchasing process.

In September 2019, NEUPC hosted the national Conference on University Procurement (COUP) and included a CPD workshop by PhD student Michael Rogerson on “The importance of Modern Slavery statements in Higher Education.”

For NEUPC staff, our induction training makes clear our commitment to eliminating modern slavery from our supply chains and a copy of this statement will form part of the HR manual which is read by all new employees as part of their induction. Also as part of new staff induction, they 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 and this is embedded in NEUPC systems and processes.

In February 2020, all NEUPC staff involved in procurement undertook the CIPS Ethics e-learning and test which has resulted in NEUPC being awarded the CIPS corporate Ethics Certificate, the first HE consortia to do this and allows NEUPC staff to use the certification mark below on their email signatures. NEUPC is also listed on the CIPS [Corporate Ethics Register](#). NEUPC intends that its staff should undertake the e-learning and test annually to ensure the currency of knowledge.



North Eastern Universities
Purchasing Consortium



NEUPC future plans

NEUPC will review this statement annually in order to establish the progress made in minimising the risk of slavery and human trafficking in our supply chains.

A supplier webinar has been developed covering key sustainability drivers in HE including MSA and reminds suppliers of their obligations under the Act and explains what NEUPC expect from their Framework suppliers. It will be circulated to all Framework Suppliers in April 2020

A funded 100 hour student internship has been developed with the University of Sheffield to map the ethical and modern slavery risks in the supply base and develop due diligence and supply chain mapping methodology for sub tier 1 suppliers.

NEUPC will review its systems for monitoring sustainability and modern slavery to ensure the relevance and accuracy of data to ensure that risks, issues and actions can be effectively tracked and monitored.

NEUPC are currently achieving Level 4 of [DEFRA's Flexible Framework](#), a self-assessment mechanism that allows organisations to measure and monitor their sustainable procurement progress. In 2020, NEUPC is working to map its processes to ISO20400:2017 and undertake independent assessment to confirm effective compliance.

NEUPC is in the process of refreshing its Responsible Procurement Policy and guidance in spring 2020 to enhance its social value focus in line with the UK Governments 2019 [Social Value in Government consultation paper](#) , in particular 4 key themes

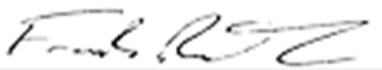
- I. Skills and Employment
- II. Diverse Supply Chains
- III. Environment
- IV. Safe Supply Chains

The Safe Supply Chain theme is specifically focused on methods for identifying and eliminating issues of modern slavery from NEUPC's supply Chains



North Eastern Universities
Purchasing Consortium

This statement was approved by the NEUPC Board on 12th May 2020 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:

NEUPC Ltd

Phoenix House

3 South Parade

Leeds

LS1 5QX

Phone: 0113 487 1750