



NEUPC Slavery and Human Trafficking Statement Review Period May 2023-2024

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 statement sets out the steps that NEUPC has taken 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. 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 6 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 within 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 Category Managers. 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 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

As a member of UK Universities Purchasing Consortium (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.



North Eastern Universities
Purchasing Consortium

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.

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 2019 [Social Value in Government consultation paper and subsequent PPN/06-20](#), 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.

The NEUPC strategy focuses responsible procurement as one of five goals with specific measures that NEUPC will strive to excel and meet the vision of being "In partnership with members, deliver collaborative procurement support to enhance academic excellence, creativity and a sustainable business model".

Our 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.

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.

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. 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](#). Our strategy has specific supplier targets which we will monitor and report.

Effective Action Taken to Address Modern Slavery

NEUPC have developed a supplier webinar covering key sustainability drivers within HE including, Modern Slavery Act and reminds suppliers of their obligations under the Act and NEUPC expectations.

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.

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.”*

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 contract award.
- A minimum 10% sustainability weighting in tender evaluation criteria.
- 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 and continue to 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 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.

473 of NEUPC Framework suppliers have signed up to NETpositive by the end of February 2023 and of those 473 suppliers, 100% have confirmed that they are aware of the Modern Slavery Act. 113 suppliers are above the £36 million turnover threshold and 96% of those above threshold suppliers have confirmed that they have made a public commitment to Modern Slavery.

Training on Modern Slavery and Trafficking

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.

Employee induction training makes our commitment clear to eliminating Modern Slavery from our supply chains. This statement is included within the HR manual which is read by all new employees as part of their induction. 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 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](#).

NEUPC Future Plans



North Eastern Universities
Purchasing Consortium

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

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 and model evaluation criteria based on the UN SDG's for use by university staff, which covers Modern Slavery also.

NEUPC plans to update its induction webinar for suppliers during 2023 to include updated information on Modern Slavery including the need to publish the Modern Slavery statement on the Home Office database and the new fixed date for submission.

As part of NEUPC's ISO20400 Continuous Improvement Plan and focus on the 'Safe Supply Chains' theme, it is conditional that suppliers provide a Modern Slavery statement as a condition of award of frameworks.

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.

This statement was approved by the NEUPC Board on 23rd May 2023 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