

Liverpool John Moores University Modern Slavery Act Transparency Statement 2018/19

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 2019 to prevent Modern Slavery and Human Trafficking in its business and supply chains.

1. Introduction

1.1 Liverpool John Moores University published its first Modern Slavery 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. 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. Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

1.2 We are committed to better understanding our supply chains and working towards greater transparency in, and responsibility towards, people working within them.

1.3 We are committed to working with our suppliers in our supply chains to encourage more of them to commit to the highest standards of business in dealing with Modern Slavery.

2. Our Business and Structure

2.1 Liverpool John Moores University is a modern civic university, integral to the life of the City of Liverpool, yet with a global approach and footprint forging international partnerships to facilitate world-leading research and collaboration in order to tackle some of the huge global issues facing the modern world.

2.2 With roots dating back to 1823, we are one of the largest Universities in the UK. Home to over 23,800 students and 2,400 staff, drawn from over 120 countries world-wide, our academic structure is divided into five faculties, each home to world-leading research, teaching and learning in a wide range of fields. At any one time, we have around 2,000 students enrolled on accredited University courses overseas.

2.3 The university partners with like-minded institutions and organisations within the UK and around the world to deliver its learning programmes.

2.4 The University has eight subsidiary companies, seven based in the UK and one based in Malaysia:

- JMU Services Limited
- JMU Learning Resource Centre Development Limited
- JMU Property Development Company Limited

- JMU Building Services & Maintenance Limited
- Standard Trace Metal Quantification Limited
- LJMU Recruitment Agency Limited
- Liverpool John Moores (Malaysia) SDN.BHD (in process of being wound up)
- The Liverpool Business School Limited

2.5 The University has a 50% interest in the company Sensor City Liverpool Limited, which is treated as a joint venture, a 24.5% interest in Liverpool Science Park Limited, and a 33.3% interest in Sciontec Developments Limited, which are treated as associates.

2.6 The University was established as a Higher Education Corporation under section 124A (3) and (4) of the Education Reform Act 1988. It is a legally independent corporate institution with charitable status accountable through a governing body, which carries ultimate responsibility for all aspects of the University.

2.7 The University is an exempt charity under the Charities Act 2011. The Office for Students is our principal regulator, ensuring we fulfil our obligations under charities law.

2.8 Our day to day operations are overseen by an Executive Leadership Team, headed by the Vice Chancellor. During 2018/19 each of our five faculties was led by an Executive Dean. We had three business services divisions (Organisational Enhancement; Finance and Resources and Student and Academic Services), each of which was led by a Deputy Chief Executive. From 1st August 2019 there have been a number of organisational changes such that the Faculties are now led by Faculty Pro-Vice Chancellors and the business service divisions are led by a Finance Director, Executive Director of Human Resources and Registrar & Chief Operating Officer.

2.9 Given the complexity and evolving nature of Modern Slavery and Human Trafficking, we have formalised our internal governance of this risk at the highest level: Executive Deans of each academic area and the Deputy Chief Executives of each of the business services divisions are responsible for ensuring that their respective areas comply with due diligence requirements set and overseen by the finance team within Finance and Resources in relation to the approval and use of suppliers and the approval of collaborative partners. Executive Deans and Deputy Chief Executives are required to certify compliance in their respective areas on an annual basis.

2.10 Progress will continue to be reported annually to the Board of Governors.

3. Our Values

3.1 Our forerunner The Liverpool Mechanics Institute was founded in 1823 on the ethos of transformation first of the individual, then through them, of communities, cities and the world. In our 26th year as a University we still remain true to this heritage.

3.2 We are a socially responsible institution, aware of our impact as an organisation within our local community. We recognise our responsibilities as a major employer and contributor to the local economy and to society at large. Equally we seek to minimise our environmental impact and encourage responsible and ethical behaviour in all aspects of our operations.

3.3 Our values and commitments are embedded in our Strategic Plan 2017-22, which can be accessed ([here](#)). We have undertaken within our Strategic Plan to act as a catalyst for social change. We have a number of policies and procedures, which embed these values into our day-to-day activities (see section 6).

4. Supply Chain

4.1 In 2018/19 we purchased approximately £87m of goods, services and works through various supply chain arrangements.

4.2 Our supply chain includes a large number of diverse suppliers, including suppliers of goods and services that directly support research and teaching activity, for example, for the supply of student computer equipment, library services including books and online services, and suppliers of indirect goods and services not directly related to these activities such as estate maintenance. A large proportion is bought through frameworks established by collaborative HE consortia.

4.3 Our main areas of expenditure can broadly be classified as follows:

Expenditure type	Value £m	%
Academic departments and services	31,265	36
Administration and central services	13,449	15
Estates	33,801	39
Residences, catering and conferences	1,150	1
Research grants and contract	7,557	9

4.4 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. As part of our initiative to identify and mitigate risk in respect of our supply chain, we are continuing to implement and improve systems to identify and assess potential risk areas in our supply chains and to mitigate the risk of Modern Slavery and Human Trafficking occurring.

4.5 All new suppliers are obliged to complete a due diligence questionnaire aimed at identifying modern slavery and human trafficking risks. Our standard contractual terms refer to MSA compliance and impose contractual controls on suppliers/third parties in this regard. These contractual controls are reinforced by our Anti-Slavery and Human Trafficking Policy, as well as the enhanced due diligence checks.

5. Due Diligence

Identifying and assessing potential risk areas in our supply chains

5.1 In order to try and understand the risks we face from our global supply chain, we carry out monthly risk assessments of our suppliers. These cross-reference both country of origin and value of expenditure. We have devised a score card against which each

supplier can be assessed using a scoring mechanism based on how countries are ranked on the Global Slavery Index.

5.2 Based on the risk assessment carried out we contact our top 100 suppliers (by value of expenditure) each month, on a rolling basis, to make them aware of the University's commitment to, and to determine their response to the Modern Slavery Act and to encourage them to share the University's objectives to prevent Modern Slavery in their supply chains. We ask suppliers to complete a declaration to state their company's turnover, and whether they are fully compliant with the obligations under the Modern Slavery Act 2015. Suppliers are also asked to sign up to the NETpositive toolkit (see 5.3).

We have integrated supplier responses from the NETpositive toolkit (see 5.3) into our risk assessment to provide additional information, and also save links to transparency statements on web sites and to documents provided to us by suppliers, for example anti-slavery policies.

Supplier engagement

5.3 The University continues 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, encouraging suppliers to develop a code of conduct and publish a Modern Slavery Transparency Statement.

6. Our Policies and Contractual Controls

Finance

6.1 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. This is an overarching framework providing guidance to support the University's vision, mission and values and the Ethical Investment Policy, Fairtrade Policy, Procurement Strategy, Sustainable Procurement Policy and Financial Due Diligence Process are all set within that Framework.

6.2 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.

6.3 Our Sustainable Procurement Policy, in conjunction with our Procurement Strategy, sets out our aims in relation to developing ethical criteria in supplier and product/service selection. Staff are advised to consider suppliers' environmental and social credentials during the contracting process.

6.4 We are a Fairtrade University, committed to the Fairtrade aims of better prices, decent working conditions, local sustainability and fair terms of trade for farmers and workers in the developing world. The elimination of modern slavery is embedded in the Fairtrade Standards.

Research

6.5 We have a Research Code of Practice, which provides a framework for good ethical governance to be followed when staff and students undertake any academic activities.

Employment

6.6 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.

6.7 We are committed to ensuring that people are paid appropriately for the work that they carry out. In March 2016, we became the first University in Liverpool, and the largest employer in Liverpool, to be accredited as a Living Wage employer.

Policies

6.10 We operate a Dignity at Work policy which sets out the University's commitment to protecting staff in their work place with the intention that all staff are treated fairly and consistently.

6.11 Our Equality and Diversity policy sets out the University's commitment to promoting equal opportunities for all those involved within the University community, whether staff, students, visitors, contractors or clients. This commitment is to ensure that people's individual qualities are recognised and celebrated; and that people are treated with dignity and respect.

6.12 We place the highest importance on the integrity of our operations, and have in place a number of policies and procedures to address problems that may arise for our students and staff.

6.13 In 2019 we launched Respect Always! a collaboration between LJMU and JMSU which aims to get to the heart of what 'respect' means to us all as individuals and to collectively recognise this across the University. We have also produced the [Respect, Always! charter](#) which aims to demonstrate our commitment to putting respect at the heart of everything that we do.

7. Training

7.1 The University provides staff involved in recruitment with appropriate training, to ensure legal compliance.

7.2 Our Finance staff receive regular training and updates on changes to the law.

7.3 To ensure a high level of understanding of the risks of Modern Slavery and Human Trafficking in our supply chains the University offers two e-learning modules. The first module is a general training package and is available to all University staff. 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.

7.4 The second module is a bespoke training package, which is aimed at key University staff. This comprehensive training 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. We have also encouraged the members of the Executive Leadership Team and the Board of Governors to undertake the training.

8. Raising awareness

8.1 We have a dedicated intranet page, which provides information to staff and students on the Modern Slavery Act and the actions the University is taking towards eliminating Modern Slavery and human trafficking from its supply chains. The website is updated on a regular basis to inform staff of the progress the University is making towards its Modern Slavery obligations.

8.2 On 18th October 2018 Anti-Slavery Day, the University twitter account @LJMUSTaff tweeted the hashtag #AntiSlaveryDay and shared the links to online training modules to remind staff to engage and complete.

8.3 In February 2019 the University joined the Universities Studying Slavery (USS) consortium. USS is trans-Atlantic group of universities committed to researching and confronting institutional links to slavery, and the ways that slavery's complicated racial legacies have shaped university life. As a first step, the University held an initial internal meeting, open to all employees of LJMU across all departments, to discuss ways that an 'LJMU and Slavery' project might progress.

9. Steps taken in Preventing Modern Slavery and Human Trafficking during 2018/19

During 2018/19 we have built 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 as follows:

- Continued to provide an e-learning module targeted at frontline staff, providing comprehensive training, and detailed case studies.
- Updated the dedicated intranet page in respect of Modern Slavery.
- Continued to carry out supplier risk assessment, categorising supplier risk in the context of value of supply and country of origin using the Global Slavery Index (GSI) as a reference. (updated for the 2018 GSI).
- Continued to subscribe to the supplier sustainability toolkit NETpositive, which enables suppliers to develop a sustainability action plan which includes Modern Slavery.
- Continued to contact our top 100 suppliers on a rolling month by month basis, by value of supply, to ask them to sign up to NETpositive and develop their own code of conduct and publish a Modern Slavery statement.
- Published our Anti-Slavery and Human Trafficking Policy on the University's web pages.
- Continued to embed Modern Slavery controls and requirements into our standard contracting processes.
- Continued to implement the Modern Slavery questionnaire as part of the new supplier and partner set up process.
- As part of the latest tender for the provision of fish and seafood for University catering, suppliers were required to have Marine Stewardship Council (MSC) accreditation or chain of custody certification. The supplier appointed has both MSC accreditation and has a modern slavery statement.
- All members of the University's Executive Leadership Team (ELT) and Board of Governors were registered to complete the University comprehensive modern slavery training module. 6 undertook the modern slavery training during the year.
- In February 2019 the University joined the Universities Studying Slavery (USS) consortium. USS is trans-Atlantic group of universities committed to researching and confronting institutional links to slavery, and the ways that slavery's complicated racial legacies have shaped university life. As a first step, the University held an initial internal meeting, open to all employees of LJMU across all departments, to discuss ways that an 'LJMU and Slavery' project might progress.

We have clear plans for the year ahead in terms of further steps we will be taking to mitigate Modern Slavery risk.

10. Assessment of Effectiveness in Preventing Modern Slavery and Human Trafficking

10.1 Reporting on KPIs

During 2018/19 we have engaged with suppliers from 60 countries, invoicing us with approximately £74 million of goods and services.

Total number of suppliers in 2018/19 = **3,089 (£74m)**

Number of suppliers identified as having modern slavery statements = **304 (£45.897m)**

Number of suppliers who have signed up to the Net Positive sustainability toolkit = **281 (£17.69m)**

Number of suppliers who have provided a declaration to state their turnover is less than £36m, but have signed to acknowledge they have read and understood the University's Transparency Statement and Anti-Slavery Policy = **19 (£14.083m)**

Number of suppliers who have signed tender agreements which include Supply Chain code of conduct = **3 (£1.182m)**

Supplier Origins

Australia	Hong Kong	Oman	Thailand
Austria	Hungary	Pakistan	The Netherlands
Bahrain	Iceland	Peru	Uganda
Bangladesh	India	Portugal	United Arab Emirates
Belgium	Indonesia	Qatar	United Kingdom
Brazil	Ireland	Saudi Arabia	USA
Brunei	Israel	Serbia	Uruguay
Canada	Italy	Singapore	Vietnam
China	Japan	Slovakia	Zimbabwe
Costa Rica	Jordan	Slovenia	
Cyprus	Kuwait	South Africa	
Czech Republic	Malawi	South Korea	
Egypt	Malaysia	Spain	
Estonia	Mexico	Sri Lanka	
France	Nepal	Sweden	
Germany	Nigeria	Switzerland	
Greece	Norway	Tanzania	

In our previous statements, we committed to report on the following key performance indicators. The table below details our progress:

Actions taken to strengthen supply chain auditing and verification	We have implemented a monthly detailed supplier risk assessment and further begun to understand the risk profile of our supply chain. Whilst 96% of our suppliers are based in the United Kingdom, we recognise that the remaining suppliers are scattered across the globe, and some are based in high-risk countries (as identified by the Global Slavery Index).
Supplier responses and action plans developed through NETpositive toolkit	We contacted our top 100 suppliers (by value) on a rolling monthly basis and requested they sign up to NETpositive and develop an action plan. At year end 566 of LJMU's suppliers indicated they are taking steps to address Modern

	Slavery in their business, through the NETpositive toolkit.
Steps taken to upskill any suppliers identified as "high risk", and assessing their ability to detect and mitigate Modern Slavery risk in supply chains	We have continued to use the supplier engagement toolkit NETpositive to help educate suppliers in respect of sustainability and specifically encourage suppliers to create an action plan for Modern Slavery and to publish a transparency statement.
Staff training levels	We provide two bespoke training courses, 'Understanding Modern Slavery' for all staff, and 'Modern Slavery - Awareness and Understanding' for key staff. To date 1,749 staff have completed 'Understanding Modern Slavery' and 96 Finance and frontline Staff have completed 'Modern Slavery - Awareness and Understanding'. Initially the module 'Modern Slavery - Awareness and Understanding' was rolled out to key staff in Finance, Legal and Governance, International and Research and Innovation Services, however in 2018/19 this was also made available to our Executive Leadership team and Board of Governors.
Investigations undertaken into reports of Modern Slavery and remedial actions taken in response.	No instances of Modern Slavery have been discovered or reported in 2018/19.

10.2 In order to assess the effectiveness of the measures taken by the University we will continue to review the key performance indicators identified above and reporting on them in our future Modern Slavery statements:

11. Our Plans for the Future

11.1 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.

11.2 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 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 review and monitor supplier action plans developed through the NETpositive toolkit.
- We will continue to embed our Anti-Slavery and Human Trafficking Policy.
- We will continue to provide training for all key staff on MSA compliance, with a particular focus on the Human Resources Department and Academic Registry.
- We will continue to review and update all relevant policies and controls to embed MSA awareness.
- In 2019/20 we will become an affiliate member of Electronics Watch through NWUPC. Electronics Watch is an independent body who assist public sector organisations to ensure the rights of workers in the electronics industry are protected. (member from 1st September 2019 through NWUPC)
- The University recognises that there is a significant risk of Modern Slavery and Human Trafficking within the construction industry, as identified by the International Labour Organisation. This, coupled with uncertainty around Brexit, which may lead to changes to EU worker's rights, and cost uncertainty following changes to the value of the pound, means the risk the University faces in this area is significantly high. With a number of high value construction projects either ongoing or due to start, we plan to map our risk and put steps in place to minimise these risks.
- Joining the Universities Studying Slavery consortium was a first step towards exploring our history in this area. The University will develop a plan to set out how an 'LJMU and Slavery' project might progress.
- Our Chief Executive will write to all new partners and suppliers, setting out a statement of the University's core values (including the importance of robust anti-slavery measures) in order to set clear expectations for the conduct of the business relationship.

If you have questions about this statement, please contact Belinda McGuinness, Deputy Finance Director (b.mcguinness@ljmu.ac.uk)

Declaration

This statement has been approved and published by the Office of the Vice Chancellor and will be reviewed at least once annually.

Signed



Mr Mike Parker CBE
Chair of the Board of Governors

Professor Ian Campbell BSc, MSc, PhD
Vice Chancellor and Chief Executive

This statement was approved by Liverpool John Moores University Board of Governors on 25th November 2019.