

SUMS Group

Slavery and Human Trafficking Statement

August 2021

Introduction

SUMS (Southern Universities Management Services) works for universities and is owned by universities. SUMS is a not-for-profit, a registered charity and membership organisation that has three divisions.

It is a company limited by guarantee, registered in England and Wales no. 2732244, and registered charity no 1042175. The SUMS Management Committee (the Board) has responsibility for SUMS' strategic direction. The Board comprises representatives from different disciplines in our member institutions: for example, Pro Vice Chancellors, Secretary and Registrars, Finance Directors, and Heads of Procurement. The three divisions are:

1. **SUMS Consulting** provides expert consultancy to the higher education sector.
2. **Procurement Shared Service (PSS)** helps universities improve procurement performance by helping clients focus on what matters to deliver value for money and feel confident about the work they do.
3. **SUPC** helps universities and colleges buy smarter. Members use our frameworks and support services to help ensure their procurement activities deliver value for money for students, staff and the wider community.

This year we recognise the entire group of SUMS, PSS, and SUPC in our Modern Slavery Statement. We recognise the overall group turnover is lower than the financial threshold of section 54 of the Modern Slavery Act 2015 and that the procurement activities of SUMS and PSS are minimal.

The joint statement demonstrates our commitment in respect of modern slavery, human trafficking, forced and bonded labour, and labour violation rights in our supply chains. This statement therefore demonstrates the steps that the group have taken to identify, prevent, and mitigate such risks.

SUMS is committed to acquiring goods and services for its members without causing harm to others. SUMS is committed to supporting the UK Government's approach to implementing the UN Guiding Principles on Business and Human Rights.

Procurement

SUPC is one of six regional purchasing consortia serving UK Higher Education (HE): many of the framework agreements that SUPC manage are shared nationally. Using our agreements, members procure competitively priced goods and services across a wide range of commodity areas. These agreements save members both time and money. Members also have access to advice, support and market knowledge.

SUPC is in a strategic partnership with London Universities Purchasing Consortium (LUPC). A Strategic Partnering Advisory Board oversees this partnership. Its membership is made up in equal numbers of members of both consortia.

SUPC has a Council that comprises Heads of Procurement from each of our full member institutions and represents a wide range of institutions from large research-intensive universities to smaller specialist universities. The Council informs the work of SUPC.

SUPC is a member of UK Universities Purchasing Consortia (UKUPC), the shared vehicle by which English, Scottish and Welsh HE purchasing consortia manage joint contracting, developmental and improvement projects for collaborative procurement in the HE sector.

SUPC Spend Categories that Present Risks of Human Rights Abuses

SUPC's supply chains fall under five 'super-categories':

1. Science, Technical, Engineering and Medical (STEM) Goods and Services
2. Corporate Services, including Travel
3. Information & Communication Technology (ICT) Equipment and Services
4. Estates Goods and Services
5. Academic Services.

The principal areas that carry material risks are office supplies, laboratory consumables, ICT and AV equipment, workers in the travel and hospitality industries, and some estates services, such as cleaning and security services.

Suppliers in these higher-risk areas have been asked by SUPC to commit to the Base Code of the Ethical Trading Initiative (ETI). SUPC will work to persuade suppliers in these categories to support these initiatives. The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice, requiring that:

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour is not used

5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practised
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed.

Science, Technical, Engineering and Medical Goods and Services

SUPC leads the national (excluding Scotland) agreement for laboratory consumables. A wide range of products are supplied, many of which are sourced from overseas manufacturers that operate in low-cost countries where forms of modern slavery are prevalent. Suppliers in these higher-risk areas were asked about their commitment to the Base Code of the Ethical Trading Initiative (ETI) as part of the renewal of the Laboratory Consumables Framework undertaken in early 2019.

ICT Equipment and Services

SUPC leads in the procurement of servers and storage equipment as well as IT-related parts and accessories for UK higher education institutions. We play an active part in the management of supply agreements led by sister consortia for Apple products, desktop computers and notebooks, and other ICT equipment.

A review was undertaken of the modern slavery statements for the awarded suppliers on the new ITRAP framework with guidance provided where SUPC believed the statements fell short of the standards we expect of our supply chains. SUPC will also include the review of modern slavery statements as a key criterion in the evaluation and award of the Servers and Storage (SSNA) agreement which will be tendered during the course of 2021.

Estates Goods and Services

SUPC works with contracted suppliers to ensure we meet our responsibilities concerning modern slavery, human trafficking, forced and bonded labour and labour rights violations in our supply chains.

SUPC are aware that construction and janitorial are areas that are high risk in the UK for modern slavery. Whilst SUPC do not let any frameworks of our own, we ensure that we have sufficient tools to equip our suppliers where need be, to assist them in managing such risks.

Corporate Services

SUPC are aware that Temporary and Permanent Recruitment is a still a high-risk area for modern slavery in the UK. We continue to work with our supply chain, especially SMEs to ensure they understand their obligations as part of the framework.

We also recognise that the Travel Framework is another area where there are risks of modern slavery, particularly overseas, where suppliers might lose sight of some areas of their supply chains. Hospitality workers are at high risk, so we made specific mention of this while tendering, requiring our suppliers to be consciously aware in this area.

Academic Services

SUPC are aware that the Library Services Framework and the Periodicals framework are of lower risk than many others, but not exempt, due to the nature of the goods and services provided. The physical element of packaging and warehousing books does present a risk, but the largest part of the market is 'e-services' where there is little human intervention.

Our Due Diligence Processes and their Effectiveness

SUPC are current users of the NETpositive Supplier Engagement Tool.

The tool provides a valuable mechanism for us to monitor our suppliers' awareness and engagement of modern slavery in their supply chains. The tool collects their data of awareness and engagement and shows if their actions are in progress or completed. This allows us to engage meaningfully with them from a position of knowledge and guide them where necessary.

UKUPC Responsible Procurement Group

SUPC are proud to have a member of the team actively participating in the UKUPC Responsible Procurement Group - a new cross consortia group that focuses on all aspects of Responsible Procurement. Deliverables have included a Responsible Procurement Glossary, to ensure we standardise meanings across the sector and our respective supply chains. The group have also produced standard tender questions, based on the United Nations Sustainable Development Goals, some of which tackle modern slavery; this is available for all consortia and their members to use at tender or call-off stage.

SUMS Sustainability Policy

SUMS group has recently updated its Sustainability Policy, to make specific reference to 'People and Social' and outline our commitment to human rights throughout supply chains, in not only modern slavery but Equality, Diversity and Inclusivity. Many aspects of this will help change the conversation around slavery and marginalisation.

Through UKUPC we align with the other HE consortia and share a common [Sustainable Procurement Policy](#).

Electronics Watch

SUPC supports the principles of Electronics Watch, an independent monitoring organisation working to achieve respect for labour rights in the global electronics industry, through socially responsible public purchasing in Europe. We subscribe to Electronics Watch and include their contract monitoring clauses in all relevant agreements that we award.

In 2019, Electronics Watch undertook eight full compliance investigations, documented and responded to worker complains in nine factories, screened 56 factories, conducted a full regional risk assessment. One supply chain screening involved two major OEMs covering 38 suppliers. As a result, ten factories improved their conditions, eight brands engaged to improve conditions, and compensation was secured for 12,000 workers for excessive and unfair recruitment fees.

We continue to work with contracted suppliers to monitor regimes where corporate codes of conduct, and social auditing policies and practices, are failing in their transparency and effectiveness.

Our Targets for Last Year

Sustain Supplier Code of Conduct

SUPC have adopted the Sustain Supplier Code of Conduct. This code is being adopted by all UK Purchasing consortia and SUPC's adoption of this code will help standardise the sector approach to modern slavery and the expectations we put on our supply base, and those of customers and institutions. SUPC will be working to embed the code of practice within SUPC practices and those of its suppliers.

Update: SUPC are working with UKUPC and the wider sector to roll out the Supplier Code of Conduct (SCC) which is widely accepted by the sector as the standard. SCC reinforces SUPC's commitment to ethical procurement, ensuring economic, social, and environmental best practice is cascaded through our supply chains.

Netpositives Supplier Engagement Tool

SUPC are updating our action plan on the NETpositive Supplier Engagement Tool. The outcomes will be two-fold, to increase our awareness and allow us to better review, improve and update our own processes and policies.

This will also allow us to demonstrate to our suppliers that the demands and standards we expect of them, are standards to which we hold ourselves accountable.

Update: We reviewed our action plan with our goals for the year and this produced an updated action plan. This action plan allowed us to better plan our activities relating to responsible procurement and modern slavery. Our SUMS group customers are also users of the NetPositives Supplier Engagement Tool, and the updated and new look tool has made managing and measuring our performance and commitment easier.

SUPC Responsible Procurement Policy

The SUMS Sustainability Policy makes mention of a new SUPC Responsible Procurement Policy which will formalise and build on the standards we already work to. By formalising them and publicising them, we are ensuring that we show our clients and institutions the standards we work to, as well as showing the supply chain what we will be expecting of them to meet our own goals.

Update: We formalised our Responsible Procurement Policy. To reflect the need of an interdisciplinary approach to ESG, CSR, responsible procurement, modern slavery and net zero, this will be updated with our additional goals outside Modern Slavery

This approach recognises that all aspects are inextricably interlinked and co-dependent on one another for success. This updated policy will aim to bring the goals together and consider issues within the broader context of their interdependency rather than in isolation.

SUPC Modern Slavery Statement Guidance

We are working with the UKUPC Responsible Group to develop a guidance to help SMEs and other organisations produce meaningful modern slavery statements that go further than meeting the basic legal requirements. We believe this will help SMEs improve their tender responses. It will outline how by making some simple changes, awareness of modern slavery in supply chains can be increased, how it can be stopped and prevented. This will complement existing guidance that allows public sector buyers to evaluate modern slavery statements as meaningful documents.

Update: SUPC worked with the UKUPC Responsible Procurement group to create and share guidance for SMEs to write meaningful Modern Slavery statements. Not only will this guide help SMEs write or improve their statements, it means that SUPC can ask for more robust measures in tenders. This guidance is deliberately written in

plain English, and is shorter than the UK Government guidance on best practice and outlines the practical steps for suppliers to write a compliant statement. It also highlights what good looks like to enable suppliers to make better choices to mitigate the risks of modern slavery in their supply chains.

Electronics Watch

SUPC is currently in discussion with the other members of the UKUPC regarding sector wide membership to cover all of the members of all the UKUPC affiliated consortia. To this end, SUPC are actively pursuing Electronics Watch membership for the members of SUPC.

Update: The sector wide approach for joint consortium membership did not succeed. This means that a whole sector approach was missed and not every institution in the UK can work with Electronics Watch to mitigate the known human rights abuses in many electronics supply chains and manufacturing locations.

SUPC is however taking forward consortium wide affiliation for our members for 2021/22.

Additional Achievements This Year

SUPC LUPC Responsible Procurement Group

This joint groups replaced the regional groups and brought together a wider range of stakeholders. This means greater awareness and visibility of responsible procurement activity within the sector, from not only procurement, but from academic stakeholders as well.

The group welcomed speakers from the University of Kent, The Natural History Museum, LSE, and Kings College.

SUPC LUPC Responsible Procurement Event

This event brought together over 150 attendees with presentations from the University of Bristol on their sustainability activity, in the context of the campus, and the wider reaching effects they have within the city of Bristol.

We also launched the joint Responsible Procurement Assessment Tool for assessing the impacts of procurement activity in relation to its economic, environment and social impact.

SUPC Modern Slavery Statement Evaluation Guide

SUPC created a simple evaluation guide to help members immediately assess the compliance of out suppliers' modern slavery statements. It covers the six areas of compliance and has an accompanying letter. The letter can be amended to send to suppliers outlining areas of non-compliance.

Supplier Modern Slavery Statement Assessment

SUPC put in place a new initiative to assess the Modern Slavery Statements of suppliers awarded to SUPC framework. This takes place when a framework goes live. The statements are assessed and a letter advising corrective action is sent if necessary. For frameworks where the risk of modern slavery and human trafficking is high, SUPC have mandated that all suppliers, not just those over the legal threshold of £36m turnover; should have made a modern slavery statement. SUPC ask those suppliers to commit to mitigating the risks of modern slavery in human trafficking in their supply chains.

SUPC Category Managers Training

This year all the category managers within SUPC completed the HEPA e-learning module 'A Guide to Modern Slavery'.

Targets for the Forthcoming Year

Electronics Watch

SUPC will¹ affiliate with Electronics Watch on behalf its members. This decision comes after significant stakeholder engagement, and ties in with a large ICT retender. This allows SUPC to change the way suppliers report information to the membership and Electronics Watch. This represents a step change for the sector in streamlining the process and pressuring suppliers to make meaningful change in the human rights space.

SUMS Group Training

This year we will look to ensure that all SUMS group staff complete the HEPA e-learning module, 'A Guide to Modern Slavery'. This will show the commitment of the organisation to increase its awareness and knowledge.

The SUPC category management team will undertake refresher training in the same area.

Contract Management

¹ SUPC affiliated with Electronics Watch on behalf of all members in December 2021.



We will add a responsible procurement section to the agenda of every supplier review meeting to ensure that suppliers remain aware of our commitment in this area. This will go beyond modern slavery to cover the many other interdisciplinary areas such as living wage, gender pay gap, ESG, EDI and CSR. We will investigate ways of measuring supplier performance in this area.

Supply Chain code of Conduct

SUPC commits to rolling out the Sustain Supply Chain Code of Conduct to suppliers not already signed up via other consortia arrangements. This document covers a range of measures such as working conditions, pay rate, EDI and CSR.

This statement has been approved by the SUMS Board and will be reviewed annually. If you have any questions, please contact supc@reading.ac.uk.

Bernarde Hyde
SUMS Group Chief Executive