

## **SUMS Group**

# **Slavery and Human Trafficking Statement**

### Introduction

SUMS Group (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 two divisions are:

1. **SUMS Consulting** that provides expert consultancy to the higher education sector. <https://sums.ac.uk/>
2. **Southern Universities Procurement Consortium (SUPC)** that helps universities and colleges buy smarter and improve procurement performance. Members use our frameworks and support services to help ensure their procurement activities deliver value for money for students, staff and the wider community. <https://www.supc.ac.uk/>

We recognise the entire group of SUMS: SUMS Consulting and SUPC in our Modern Slavery Statement. The overall group turnover is lower than the financial threshold of section 54 of the Modern Slavery Act 2015 and the procurement activities of SUMS are minimal.

This 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 outlines the steps that the group have taken to identify, prevent, and mitigate associated 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 SUPC advice, support and market knowledge.

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

## 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 works to persuade suppliers in these categories to support ETI. 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.

SUPC works to persuade suppliers in these categories to support ETI.

### ***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 award of the Laboratory Consumables Framework in 2024. The suppliers were asked to conform to the UKUPC Supply Chain Code of Conduct which is based on the principles of the ETI base code. There is a KPI within the framework which states suppliers must have 90% of their supply chain having implemented the ETI code.

### ***ICT Equipment and Services***

SUPC leads in the procurement of servers and storage equipment as well as IT-related parts and accessories for UK HE 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 ITRAP framework with guidance provided where SUPC believed the statements fell short of the standards we expect of our supply chains. SUPC included the review of modern slavery statements as a key criterion in the evaluation and award of the Servers and Storage (SSSNA) agreement which was awarded in March 2023. Suppliers have committed to full disclosure regarding the manufacturing locations utilised in the provision of goods supplied against the framework. This information will be provided to Electronics Watch to enable them to monitor and audit these factories for inappropriate working practices.

### ***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 potentially 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. Suppliers appointed to the new iteration of the Framework (going live in Spring 2025) will be required to confirm their commitment to ETI Base Code as part of their contractual obligations, as well as asserting that all suppliers in their supply chain abide by the same. We 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 both the Books, e-books, and e-textbooks 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. The Periodicals Framework (awarded in 2023) and the Books and E-books Framework (to be awarded in 2025) ask suppliers to commit to the Sustain Supply Chain Code of Conduct as a mandatory requirement. The standards in this Code are derived from the relevant established global conventions in Responsible Procurement, including the ETI base Code.

### **Our Due Diligence Processes and their Effectiveness**

SUPC are current users of the NETpositive Supplier Engagement Tool: [NETpositive Futures Info Pack](#)

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 has appointed SUPC Responsible Procurement Champion who is actively participating in the UKUPC Responsible Procurement Group - a 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 subscribe to, supporting their principles, 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 include their contract monitoring clauses in all relevant agreements that we award.

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 (2023/24)

### ***Laboratory Consumables***

This framework was retendered 2024 and suppliers were asked to commit to the Sustain Supply Chain Code of Conduct as a mandatory requirement.

### ***SSSNA***

Suppliers have committed to full disclosure regarding the manufacturing locations utilised in the provision of goods supplied against the framework. This information will be provided to Electronics Watch to enable them to monitor and audit these factories for inappropriate working practices.

### ***Temporary and Permanent Recruitment/ Travel Frameworks***

Bidders for the renewal of these Frameworks will be asked to confirm their commitment to ETI as a mandatory qualification criterion.

### ***NETpositive Supplier Engagement Tool.***

SUPC will be promoting the adoption of the NetPositives action planning tool for all suppliers newly awarded to SUPC Frameworks during the course of the 2023/24 year. This tool allows suppliers to develop a plan which ensures they are engaging

with their own suppliers regarding the development of appropriate Modern Slavery action plans and monitoring. We will continue to work with suppliers to ensure they achieve optimal value from the tool.

### **LUPC/SUPC Conference**

We included sessions on Responsible Procurement, Social Value and Modern Slavery monitoring as part of the agenda for the LUPC/SUPC conference in June 2024.

## **Targets for the Forthcoming Year - 2024/25**

### ***Laboratory Gases***

This framework is currently being retender for FY24/25 and we will be requiring bidders to confirm their commitment to ETI as a mandatory qualification criterion.

### ***ICT Frameworks***

SUPC will continue to work with suppliers that have already committed to full disclosure regarding the manufacturing locations utilised in the provision of goods supplied against the framework. This information is being provided to Electronics Watch to enable them to monitor and audit these factories for inappropriate working practices.

### **Temporary and Permanent Recruitment/ Travel Frameworks**

Suppliers appointed to the Framework will be required to confirm their commitment to the ETI Base Code, as a mandatory qualification criterion and to ensure all suppliers in their supply chain abide by the same.

### ***NetPositive Supplier Engagement Tool.***

SUPC will continue to promote the adoption of the NetPositives action planning tool for all suppliers newly awarded to SUPC Frameworks during the course of the 2024/25 year. This tool allows suppliers to develop a plan which ensures they are engaging with their own suppliers regarding the development of appropriate Modern Slavery action plans and monitoring. We will continue to work with suppliers to ensure they achieve optimal value from the tool.

### ***Supply Chain code of Conduct***

We continue to work with our fellow UKUPC consortia to deploy the Sustain Supply Chain code of conduct throughout our suppliers. This is an ongoing process and we will look to ensure that the code of conduct is adopted by all suppliers newly awarded to SUPC led frameworks.

### ***Contract Management/ Supplier Relationship Management***

We will continue with 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. In addition we require all our suppliers to have a Modern Slavery Assessment and we have a toolkit available to help those suppliers who currently do not have one

### ***Supplier Modern Slavery Statement Assessment***

Supplier statements are assessed when a framework goes live and a letter advising corrective action is sent if necessary and follow up monitoring is undertaken as part of ongoing Contract Management to ensure that updated statements are provided.

### ***SUPC Modern Slavery Statement Evaluation Guide***

SUPC created a simple evaluation guide, to help members assess the compliance of our suppliers' modern slavery statements. It covers the six areas of compliance and has a feedback template on areas of non-compliance, which can be tailored to meet need. The Guide and template have been promoted across our membership and is available for download from the SUPC website.

This statement has been approved by the SUMS Board and will be reviewed annually. If you have any questions, please contact [supc@sums.ac.uk](mailto:supc@sums.ac.uk).

Joel Arber  
SUMS Group Chief Executive

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