

THE UNIVERSITY OF LEEDS

THE COUNCIL

Modern slavery and human trafficking statement 2024/25

Introduction

This statement is made in accordance with section 54 of the Modern Slavery Act 2015.

1. It informs our students, staff, suppliers, stakeholders, community, and the public about the steps that we have taken, and will take, to mitigate any risk of modern slavery, human trafficking, forced and bonded labour and labour rights violations within our organisation and supply chains. This statement covers the 12-month period from 1 August 2024 to 31 July 2025.
2. We monitor and categorise concerns reported to us (either via our Whistleblowing procedure or any other channel). There were no allegations of potential modern slavery in 2024-25.

About the University

3. The University of Leeds is an independent corporation established by Royal Charter, granted in 1904 and is globally renowned for the quality of its teaching and research. The University is one of the largest higher education institutions in the UK with more than 40,000 students, over 10,000 staff and a turnover of over £1bn (2023-24).
4. Governed by its Council, the University is committed to meeting its social, economic, and environmental responsibilities. Driven by its values of collaboration, compassion, inclusivity and integrity, the University is unswerving in its commitment to meeting the requirements of the Act and will take all reasonable steps to ensure that modern slavery or human trafficking does not occur in any part of our organisation or supply chains.
5. In 2022, the University set out its [Policy on Responsible Investment \(PDF\)](#) explaining the commitment to ensuring the companies in which it invests adopt high ethical standards and responsible attitudes towards the environment and human rights.

Our supply chain

Procurement

6. The University's Financial Policy and Guidelines govern the procurement of goods, works and services. We are committed to sustainable procurement and our approach to delivering this is set out in our Sustainable Procurement Standard and associated Sustainable Procurement Procedure, both part of our [Environmental Management System](#). We have developed our approach to sustainable procurement using the Department for Environment, Food and Rural Affairs (DEFRA) [Flexible Framework for Sustainable Procurement](#) in Government and have self-assessed to Level 4.
7. The University is a member of the "The University Caterers Organisation" (TUCO) and the "North East Universities Purchasing Consortium" (NEUPC), both of which are members of "UK Universities Purchasing Consortia" (UKUPC). NEUPC and TUCO have published their own Modern Slavery Act 2015 (Transparency in Supply Chains) Statements.

8. The University has adopted a continual improvement approach to monitoring its supply chains and through the appointment of a Sustainable Procurement Specialist will continue to collaborate with suppliers to gain a greater understanding of the source of supply.
9. Following the introduction of the Modern Slavery Act 2015, the University updated all procurement documentation and processes to enable more initiative-taking steps to investigate and act upon any indications of Modern Slavery evidenced in the supply chains upon which we rely. Before the University awards contracts of significant value, suppliers must confirm compliance with the Act and confirm that they will support our ambitions in this regard.
10. The University appointed a Sustainable Procurement Manager to deliver continuous improvement in the approach of Purchasing through:
 - Maintaining an overview of risks in Purchasing activity
 - Embedding tackling modern slavery and human trafficking within the Category Plans and Purchasing strategies
 - Managing training and improving provision of tools and resources
 - Improving supply chain transparency through supplier engagement and continuous improvement.

Category Management

11. The University takes a category-led approach to procurement. Our categories include:
 - Hard Facility Management and Construction
 - Soft Facility Management (incorporating commercial operations)
 - IT
 - Laboratory Products and Services
 - Workshop and Engineering Supplies
 - Professional Services
 - Office Supplies
 - Travel.
12. The University's Purchasing and Sustainability Services facilitate the delivery of sustainable procurement through the category management process, seeking continuous improvement. The University has assessed each category in terms of risk against sustainability good practice, including the consideration of human rights issues and risks in the supply chains. The Purchasing team review risk levels regularly with consideration to changes in markets, risks and geo-political issues.
13. Analysis of our supply chains in relation to the Act focuses on the first-tier supplier base. The categories identified as likely to bear the greatest risk in first-tier supply are Hard Facilities Management, Construction and Soft Facilities Management (including catering and cleaning services). We are aware that these categories often rely on lower paid workers to deliver the service and are sectors where modern forms of slavery may be more likely to occur. The University's suppliers operating in these industries have been categorised into thirty-one tiered sub-groups to facilitate a more targeted approach to both sourcing and management.
14. Other high-risk areas include IT and Laboratory products, owing to the complexity of the supply chains within these industries and the wide range of components and hazardous materials used in manufacturing.

Supplier Due Diligence

15. As part of our procurement process, the University ensures that all suppliers legally required to publish a Modern Slavery Statement have done so. In high-risk categories, we go further by evaluating suppliers' supply chain due diligence and monitoring practices. We apply a weighted scoring system to differentiate and prioritise those who demonstrate integrity and proactive risk management, helping us focus our engagement on suppliers committed to ethical and transparent operations.

Supply Chain Management

16. The University is a member of both national and sector-specific groups such as Electronics Watch, which helps to mitigate and manage human rights violations in our IT supply chains. The University has continued work with Electronics Watch conducting product reviews, prioritising high volume items, to improve supply chain transparency and identify any concerns requiring intervention. Electronics Watch use their expertise and resources to undertake these checks and lead interventions within supply chains to ensure best outcomes for those at risk. Throughout this period, we have supported Electronics Watch by engaging directly with our suppliers to investigate any known or suspected supply chain risks in this sector.
17. The University uses the NETpositive Supplier Engagement Tool which helps suppliers to create and update sustainability commitments including monitoring and addressing Modern Slavery and Human Trafficking risks in their supply chain.
18. This year, we also hosted supply chain engagement days which included focus on sustainability and social value. These sessions aimed to support local SMEs by clarifying our expectations, procurement requirements, and responsible sourcing standards, helping to build shared understanding and raise collective standards across our local supply base.

Employment

19. The University's commitment to securing the rights of our staff is set out in our institutional People and Culture policies and procedures.
20. Key People and Culture policies of relevance to the Modern Slavery Act are:
 - The [Equity, Diversity and Inclusion Strategy 2022](#), which sets out the University's commitment to promoting equality across campus and also states corporate and individual responsibilities to adhere to the principles of the policy.
 - The [Code of Practice on Whistleblowing \(PDF\)](#), which sets out a process by which concerns can be raised.
 - The [Staff policy and procedures on preventing and addressing bullying harassment and sexual misconduct](#)
 - The [Personal relationships at work policy](#)

Training

21. The University remains committed to taking active steps to identify and mitigate risks of modern slavery and human trafficking across our organisation and supply chains. We have progressively built awareness and capability within our procurement team through targeted training, including: Social Value in 2020-21, Protecting Human Rights in the Supply Chain in 2022-23, and a 2023-24 session led by a local Detective Sergeant, which explored vulnerable groups, types of exploitation, and high-risk industries.
22. This face-to-face training brought real-world examples that underscored the importance of due diligence and effective reporting procedures.
23. In 2024-25, we deepened this approach by inviting the charity Unseen to speak with our procurement team. Their session highlighted supply chain risks and the human

impact of exploitation, offering powerful insights into victim recovery and the realities faced by survivors in the UK and beyond. This added a vital human dimension to our understanding and reinforced the ethical responsibility embedded in our procurement practices.

24. All category team members are either CIPS-qualified or working towards qualification, follow the CIPS Code of Conduct, and where possible, have completed the CIPS Ethical Procurement and Supply course, achieving Chartered Status.
25. Looking ahead, we aim to extend modern slavery training and awareness programmes more widely across the University, with a particular focus on Estates and Facilities Management due to the elevated risks in these sectors. We are currently reviewing industry-specific tools and training to support this expansion and ensure our teams are equipped to identify and address potential exploitation.
26. **Future** The University will review this statement annually to drive continuous improvement in reducing the risk of modern slavery and human trafficking across our supply chains. In the coming year, we will:
 - Strengthen engagement with suppliers in high-risk categories to ensure alignment with the Modern Slavery Act.
 - Enhance tracking of supplier sustainable action plans, with a focus on labour rights and modern slavery risk.
 - Regularly update procurement processes and documentation to better identify and address potential indicators of exploitation.
 - Collaborate with HE Consortia, the Leeds Anchors Network, and partners like Electronics Watch to share best practice, conduct product reviews, and improve supply chain transparency.
 - Continue delivering training for procurement teams and begin expanding awareness programmes to other high-risk areas.
 - Review, update and promote the Whistleblowing Policy to support safe reporting of concerns.
 - Explore the need for an internal policy outlining University stakeholder responsibilities and reporting mechanisms.
 - Embed modern slavery as a core priority within the new Responsible Supply Chain Policy.
 - Leverage risk management tools within our updated ERP system to improve supply chain visibility and mitigation strategies.



Alastair Da Costa
Chair of Council
27 November 2025