



# Statement on Slavery and Human Trafficking for Financial Year 2023/24

## Background

Section 54 of the Modern Slavery Act 2015 the (“Act”) requires commercial organisations that supply goods or services and have a turnover of over £36m to prepare “a slavery and human trafficking statement for each financial year of the organisation”<sup>1</sup> (“ the **Statement**”).

As a body corporate other than a limited liability partnership, the School’s Council must approve the Statement and the Schools Director must sign the Statement. Thereafter, the Statement must a) be published on the Schools website and b) the Statement must be linked from a prominent place on the Schools website homepage<sup>2</sup>.

Organisations are not required to guarantee that their activities, including supply chains, are ‘slavery free’. The Statement must describe the steps the School has taken during the financial year to identify and manage modern slavery and trafficking risks in School business activities.

The Modern Slavery Working Group (the “**Group**”) was established in 2019 to review the School’s activities and assess what processes are in place to identify the potential incidence of modern slavery and human trafficking within School business, supply chains, and other areas of domestic and global activity. The Group continues to monitor and assess potential gaps in School activities and makes recommendations for processes, policies, training and best practice that can be introduced to enhance the School’s response to addressing Modern Slavery and Human Trafficking. The recommendations and implementation outcomes from the Groups work are reflected in the School Statements.

Council is now asked to approve publication of the Statement on Slavery and Human Trafficking for Financial Year 2023/24.

## Risk assessment and mitigation

The production of the Statement on Slavery and Human Trafficking is intended to identify and mitigate risk by setting out the School’s actions to comply with the Modern Slavery Act 2015. The annual review process also triggers a review of the School’s level of compliance with the Act.

---

<sup>1</sup> Section [54 \(1\) Modern Slavery Act 2015](#)

<sup>2</sup> Section 54 (7) Modern Slavery Act 2015

## **EDI considerations**

While it is intended to reinforce the School's commitment to inclusion and fair trading practices, the Statement on Modern Slavery and Human Trafficking itself is unlikely to directly effect change in this area.

## **Ethical considerations**

The Statement on Slavery and Human Trafficking is relevant to a number of ethical considerations, as set out in the School's Ethics Code, such as Responsibility and Accountability, Equality of Respect and Opportunity and Integrity. For example, acting lawfully and transparently in its employment and procurement procedures.

## **Conclusion**

Council is asked to approve the Statement on Slavery and Human Trafficking for Financial Year 2023/2024 at Annex A of this paper. Subject to Council's approval, the School shall publish the Statement on Slavery and Human Trafficking on a prominent place on the School's website.

# **ANNEX A**

## **London School of Economics & Political Science ('LSE') – Statement on Slavery and Human Trafficking for Financial Year 2023/24**

This statement is made pursuant to Section 54, of the Modern Slavery Act 2015 and sets out the steps the LSE has taken to identify, mitigate and prevent slavery or slavery-like practices, forced labour and human trafficking from taking place in our supply chains or in any part of LSE's business.

### **Our organisational structure**

Founded in 1895, the London School of Economics and Political Science (LSE) is a leading institution in social sciences. According to the latest Times Higher Education World University Rankings<sup>3</sup>, LSE is ranked 6th globally for Social Science and Management. Additionally, LSE was named University of the Year 2025 by The Times and The Sunday Times Good University Guide<sup>4</sup>, marking the first time it has achieved this top ranking. As a specialist university with a diverse international student body, LSE's influence extends far beyond its central London campus, reaching across the globe.

The LSE is both a company limited by guarantee under the Companies Act 2006 and an exempt charity under Paragraph 2 of Schedule 3 of the Charities Act 2011. The registered office of the LSE is Houghton Street, London, WC2A 2AE, United Kingdom.

---

<sup>3</sup> *World University Rankings 2025*, Times Higher Education

<sup>4</sup> *UK University Rankings 2025: League table*, The Times

## **Our commitment**

The LSE is committed towards taking steps to identify, prevent and mitigate the risks of modern slavery, human trafficking, forced and bonded labour and labour rights violations in its supply chains and global activities. We are committed to ensuring that our activities, collaborations, our contractors and sub-contractors and all those in our supply chains comply with the Modern Slavery Act 2015.

The LSE adopts the principles of the Ethical Trading Initiative Base Code of labour practice and has its own Supplier Code of Practice which it updates regularly.

The LSE also requires compliance with our [Ethics Code](#). The Code contains a specific obligation to act with integrity and in accordance with all relevant legislation and statutory requirements. This includes compliance with the Modern Slavery Act 2015.

The School's mission of discovering, advancing and disseminating knowledge to address major socio-economic challenges across the globe will always carry certain risks. Effective risk management increases the likelihood of the successful achievement of the School's strategic objectives whilst ensuring institutional compliance, protecting our reputation and facilitating sustainability. We are committed to buying ethically and to engage our community on sustainability issues as set out in section 3.4 of our LSE 2030 strategy (invest in a world class environment).

The Modern Slavery working Group ('the Group') was established in 2019 to review and enhance LSE's response to Modern Slavery and to consider what mitigations could be implemented to address the potential incidence of modern slavery and human trafficking within the entirety of school activities and business, at home and overseas. [Details for supplier can be found here](#).

## **Reporting Concerns in the School**

The LSE takes any report of labour rights abuse, modern slavery and human trafficking seriously. All members of the LSE community including but not limited to staff, students and members of council, are expected to report any concerns relating to modern slavery or human trafficking and encourage the disclosure of information about malpractice / wrongdoing occurring in the School in order for it to be investigated with action taken as necessary.

Members of our LSE community are signposted to:

[Seeking ethical advice and reporting concerns](#)

[Whistleblowing Policy](#)

# The LSE and It's Supply Chains

## 1) Procurement and Supplier Engagement

The LSE Procurement Policy contains a specific requirement for all procurement to be undertaken in line with the LSE Ethics Code and Supplier Code of Practice. We make our expectations clear in our [Information for Suppliers](#). We use a rigorous tender process for supply agreements, and our preference is to always use our own contract terms rather than a supplier's in order to ensure compliance with statutory requirements and LSE expectations.

This enables the LSE to advocate LSE's position, which is to promote a worker-led approach in addressing slavery and human trafficking risk. In the event of a non-compliance risk, the LSE is committed to working collaboratively with its suppliers to implement effective remediation for the benefit of the affected workers. Where a suitable remedy cannot be achieved, the LSE reserves the right to terminate any agreement.

We use the LSE Supplier Code of Practice to address key issues, including modern slavery. We assess our spending categories, such as Computer Supplies and Services, Audio Visual Supplies and Services, and Estates & Buildings, rating them as high, medium, or low risk for modern slavery. This helps us prioritize our efforts on high-risk areas to ensure significant improvements.

A Modern Slavery dashboard with key indicators of performance for operations and supply has been developed as follows:

Category	Modern Slavery Risk Rating	Mitigation Actions (Section 4 Next Steps )
IT Hardware (including AV)	High	Please see <a href="#">Next Steps 5</a>
Estates & Buildings	Medium / High	Please see <a href="#">Next Steps 6</a>
Catering Supplies and Services	Medium	Please see <a href="#">Next Steps 6</a>
Facilities Operations	Medium	Please see <a href="#">Next Steps 6</a>
Professional Services / Consultancy	Low	Please see <a href="#">Next Steps 2 &amp; 6</a>
Utilities	Low	Please see <a href="#">Next Steps 6</a>
Travel and Transport	Low	Please see <a href="#">Next Steps 6</a>
Library & Publications	Low	Please see <a href="#">Next Steps 6</a>
Health and Safety & Security	Low	Please see <a href="#">Next Steps 6</a>

IT Hardware category is marked as high risk due to the complex supply chains often involved in the production of electronic components. These supply chains can span multiple countries, some of which may have weaker labour regulations, increasing the risk of modern slavery.

Estates and Building category is marked as medium risk, but due to the high value and the high rate of sub-contracting and temporary labour we will treat as a priority.

Our Procurement team have continued to ask Suppliers to engage with the [NETpositive Supplier Engagement Tool](#) in order to help support our procurement response to Modern Slavery. The tool assists in engaging suppliers on the issue of Modern Slavery, raises awareness of Modern Slavery amongst our Suppliers, helps to identify actions our suppliers are taking in response to the Modern Slavery Act and provides a mechanism for support, guidance and training to the supply base to share best practice between suppliers.

LSE also has access to Creditsafe & Constructionline which it considers as part of its overall due diligence during construction related tenders.

### **The LSE Supplier Code of Practice**

Following the creation of the Supplier Code of Practice ('the Code') [codSupPra.pdf \(lse.ac.uk\)](#), the Procurement Team have worked to ensure that it is embedded at the tendering stage for new contracts or during contract renewal for existing contracts. The Legal Team are also ensuring that the Code is embedded within key contracts. The expectation is that all our Suppliers will comply /take steps to comply with this Code and mandate these standards from their own suppliers and sub-contractors. This would apply to all of our suppliers of goods and services, consultants, sub-contractors, service providers, intermediaries and agents. In addition to Suppliers, the School also expects other organisations or institutions we collaborate with to comply with the minimum standards set out in this Code.

LSE reserves the right to monitor and review compliance, implementation and adherence with this Code via periodic reviews/audits as part of our contract management process.

## **2) Due Diligence**

We recognise that there is a level of risk in the supply chains of goods and services we procure, although the risks we are exposed to are not unique to the LSE and are shared across the Higher Education sector.

The Procurement team at LSE have committed to work closely with the London Universities Purchasing Consortium who have launched the Responsible Procurement Hub for collaborative knowledge sharing and problem solving. The Responsible Procurement Hub has been launched and is being rolled out to members in 2024-2025.

The LSE Procurement team have collaborated on the creation of a Human Rights Due Diligence Maturity Assessment tool with [Electronics Watch](#) for its affiliates to assess where in their journey they are and where they can do more. LSE presented at the webinar for its launch.

For our tenders, a template of questions is developed to assess potential bidders' capabilities in managing relevant practices and risks. Supplier responses are assessed to identify their individual journeys and contribute to the overall tendering score.

Research and Procurement are currently developing a shared due diligence process for onboarding new suppliers, consultants, consultancies, research collaborators, and other types of partnerships. This process is being reviewed to incorporate Modern Slavery and other relevant risk factors.

### **3) Contract Management and Training**

Each Procurement Manager undertakes CIPS ethical procurement training.

Contract management guidance has been updated and now includes responsible procurement and supply chain risks for consideration and discussion, these now form part of the contract management process.

Targeted training was delivered to the Construction and Project Management teams in Estates, with over 20 construction specialists in attendance. The training focused on construction risks, a high-risk area. Additional resources were provided, covering modern slavery and supply chain risks in detail.

### **4) Further progress work on recruitment agencies and ensure that relevant recruitment policies set out requirements to be aware of Modern Slavery**

The Group will also be working with the Human Resources Division in order to add a section on Modern Slavery within the staff induction programme and consider what policies and procedures may need to be added.

Further work has been carried out to ensure recruitment policies and other relevant policies/procedures within the Human Resources Division address key risks in relation to Modern Slavery.

### **5) Continue to work with Electronics Watch**

Members of the Procurement team contributed during three days of online workshops for Public buyers and workers - advancing human rights together within the U.K. and other parts of Europe.

LSE continues to work closely with Electronics Watch and has an on-going presence on the Board of Trustees and various Brand and task groups. One of the task groups made a joint statement letter which can be found here:

Members of the LSE Procurement team will be facilitating discussion amongst attendees at various sessions, which includes Chairing and Moderating panels at the Annual Conference Brussels November 2024.

### **6) Develop and build networks and further engage and collaborate with other organisations and Universities and share good practice.**

LSE is committed to continuously learning about modern slavery and supply chain issues and actively shares its insights and knowledge:

- LSE are members of the [Higher Education Procurement Association \(HEPA\)](#) Responsible Procurement Group, which hosts events with expert speakers and shares practical advice through case studies with its members.
- LSE are also members of the International Working Group on Ethical Public Procurement (IWGEPP) which hosts online clinics, events etc to support each other's work in this area. Its members are from across Europe.
- LSE are affiliate members of Electronics Watch, a worker driven human rights charity for the IT sector supply chain workers.

## Next Steps

<b>1. Ongoing development to current risk assessments and use of the netpositive tool amongst suppliers</b>
<b>2. Continue to work with academic and research partnerships colleagues to inform appropriate due diligence processes</b>
<b>3. Continue to work with <a href="#">Electronics Watch</a> and other third party organisations in order to inform, educate and contribute to the debate</b>
<b>4. Continue to work with Human Resources to embed Modern Slavery awareness and risk mitigation as necessary</b>
<b>5. Continue to Develop Appropriate Modern Slavery Training</b>
<b>6. Continue to Use the Supplier Code of Practice and Due Diligence aspects where appropriate within Tenders As Standard</b>

Professor Larry Kramer  
President and Vice Chancellor of LSE

<b>Position</b>	<b>Name</b>	<b>Email</b>	<b>Notes</b>
Head of Legal Services	Geraldine Ismail	<a href="mailto:g.ismail@lse.ac.uk">g.ismail@lse.ac.uk</a>	Author
School Secretary	Louise Nadal	<a href="mailto:l.nadal@lse.ac.uk">l.nadal@lse.ac.uk</a>	Sponsor