



THE UK MODERN SLAVERY ACT

2015

LUPC holds suppliers to account on their Modern Slavery Statements

Commencing in April 2021, Marisol Bernal, LUPC's dedicated Responsible Procurement Lead, and Martina Trusgnach, PhD researcher with the BHRE at the University of Greenwich, began [a project](#) to research the Modern Slavery Statements of our top 20 suppliers (based on our spend and commodity risk categorisation).

The next phase of the project involved following up to make sure the suppliers acted on our recommendations, initially with a focus on the mandatory elements of their statements, which are:

- To be visible in a prominent place on the website;
- Refer to work carried out in the previous financial year;
- Approved at the highest level of governance (Board of Directors or equivalent management body); and
- Signed by someone at the most senior level (Director or equivalent).

The findings from our research are as follows:

1) Some suppliers are not legally required to have a Modern Slavery Statement, as their turnover is below the threshold:

- Gresham Office furniture;

- BBCS Ltd;
- Step Ahead; and
- GVAV Ltd.

Although not required to have a Modern Slavery Statement, GVAV Ltd. were happy to work with LUPC on their statement. After our initial analysis, they made all the changes we suggested and are now fully compliant. They have been very engaged throughout our review, listened to feedback and acted to make positive changes.

Kristian Cutting, Joint Managing Director at GVAV says: *"Whilst not obliged by Section 54 of the Modern Slavery Act 2015 to have a Modern Slavery Statement, we felt it both necessary and right to do so. We abhor modern slavery in all its forms and want our team to be well equipped to identify any instances they may encounter. For this reason, we were delighted to work with LUPC who supported us with their expert advice and guidance to ensure our Modern Slavery Statement is compliant."*

2) Suppliers with compliant statements in the first review, where we did not require further action were:

- Churchill Contract Services Ltd
- Carl Zeiss Ltd



- Reed Recruitment
- WHS Limited
- Bidfood

3) Two suppliers did not initially comply with the mandatory elements of the Act, they were contacted and recommendations for changes were made, which they are implementing as follows:

- Fisher Scientific UK have made their latest statement available on the home page of their website. However, they still have one outstanding action, which is to get Board approval; and
- Adecco Group UK & Ireland have now included the title of the person signing the statement, which was previously unclear so their statement is now compliant.

4) Suppliers that were found to be non-compliant with the mandatory elements in the first review, but have not yet changed their statements, despite our attempt to engage with them are:

- VWR International Ltd acknowledged our recommendations, but their statement is still waiting approval by the Board;
- Thermo Fisher Scientific has not made any changes since our first review. The statement has not been updated since 2018 and has still not been approved by the highest level of governance;
- Engie still needs Board approval for their statement;
- Covetrus did not make any changes to their statement and it is not in a prominent place on their website as required; it could only be found via a google search;
- Scientific Laboratory Supplies Ltd (SLS) published their previous statement with a new date, but it is still not compliant as it does not have Board approval nor does it include the financial year the statement refers to;
- Brakes Bros is still missing Board approval for their statement;

- Bruker UK Ltd has published a statement for the year ending Dec 2021, which makes it not compliant, as statements should look back at the last financial year;
- Dell Corporation Limited acknowledged our recommendations but their statement still needs approval by the Board; and
- CIS Security Limited statement is still not visible on a prominent place on their website.

The first step of writing a Modern Slavery Statement is to ensure it complies with the mandatory elements. We hope the suppliers who are still not compliant will get there very soon and we will continue to work with them if they need any support.

The next step of our analysis will focus on the content of the Modern Slavery Statements.

Don Bowman, LUPC's Director, says: *Addressing modern slavery risks, as part of our wider responsible procurement strategy, is a topic of huge importance to LUPC; we were the first public body to produce a Modern Slavery Statement. It is evident that there is much work to be done to highlight the importance of this legislation and improve the quality of statements of our suppliers. We will continue to assist our suppliers to meet the minimum required by law and to improve the quality of their statements and the work that is carried out to support these to deliver meaningful risk management of their supply chains.*

We are in the process of working on our seventh annual statement but our most recent [Modern Slavery Statement](#) is on our website. Our aim is to continue to be a leader in this area as we strive to ensure the frameworks we deliver for our members cause no harm to others.

Marisol Bernal, Responsible Procurement Lead

Martina Trusgnach, PhD researcher with the BHRE at the University of Greenwich

