

Ensemble Purchasing

Slavery and Human Trafficking Statement 2017

Introduction

Velocity 400 Limited (which trades as Ensemble Purchasing) is a non-profit cost sharing group providing professional procurement services to its members, established in 2016.

Ensemble Purchasing is committed to acquiring goods and services for its members without causing harm to others. In so doing, Ensemble Purchasing remains committed to supporting the UK Government's [National Action Plan](#), updated in May 2016, to implement the [UN Guiding Principles on Business and Human Rights](#).

Ensemble Purchasing's members are also members of London Universities Purchasing Consortium (LUPC), a non-profit professional collaborative buying organisation. Although a wholly separate legal entity, LUPC is very much from the same 'stable', sharing two Board members. Ensemble Purchasing uses LUPC framework agreements for goods and services wherever appropriate and thus shares the same values and commitment to sustainable and ethically responsible procurement.

This Statement is designed to satisfy the requirements of Section 54 of the Modern Slavery Act 2015, by informing members, students, staff, campaigners and the public about Ensemble Purchasing and its policy with respect to modern slavery, human trafficking, forced and bonded labour and labour rights violations in its supply chains.

Although, as a business, Ensemble Purchasing turns over far less than the threshold for businesses required to publish a statement under the Act, its Board considers that our members' collective turnover, which exceeds the threshold, warrants a statement on the risks inherent in its members' supply chains and the steps being taken to address them.

Our spend categories

Ensemble Purchasing's member supply chains mainly fall under four 'super-categories', which are:

- Library Resources
- Professional Services
- ICT Equipment and Services
- Estates Goods and Services

The principal categories which Ensemble Purchasing deems as carrying higher risks of human rights abuse are ICT equipment and some estates services, such as cleaning and security services. LUPC deems the corresponding source countries to be as follows:

<i>Category</i>	<i>Country</i>
ICT equipment	East Asia, China, India, Eastern Europe, Mexico
Cleaning services	United Kingdom
Security services	United Kingdom

LUPC has focused its resources on these highest risk categories by running pilot due diligence projects in Ensemble Purchasing's highest-risk spend categories, including cleaning services and security services

ICT Equipment

LUPC leads in the procurement of desktop and notebook personal computers for UK higher education institutions and other Members. LUPC also plays an active part in the management of supply agreements led by its sister consortia for Apple products, servers, storage and other ICT equipment.

In 2014, LUPC became a founding member 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. In March 2018, LUPC extended its affiliation to all of its full members, including all Ensemble Purchasing members.

Public sector buyers like LUPC and Ensemble Purchasing, with a will to act on labour rights issues do not have an effective way to do so as they have insufficient leverage over brands, companies and manufacturers. With Electronics Watch, LUPC is seeking to work with suppliers of ICT equipment to commit to new monitoring regimes where corporate codes of conduct and social auditing policies and practices are failing in their transparency and effectiveness. Currently there is no comprehensive, credible and independent monitoring system for the electronics industry that involves workers and local civil society organisations.

LUPC successfully pressed for the inclusion of new monitoring clauses in a new national supply agreement for Apple products in 2016, and have included them in the newest iteration of the National Desktop and Notebook Agreement awarded in 2017.

Cleaning and Security Services

LUPC offers a supply agreement for cleaning and security services to its members. These are recognised as spend categories where operatives are traditionally among the lower paid and LUPC perceives a medium-level risk to workers in these supply chains. Under LUPC's new framework agreement for these services, new clauses were introduced requiring suppliers to demonstrate their ongoing commitment to the [ETI Base Code](#), the [International Code of Conduct for Private Security Service Providers \(ICOC\)](#) and to ensuring that they take steps on members' behalf to guard against modern slavery, human trafficking, forced and bonded labour and labour rights violations in this supply chain.

LUPC and Ensemble Purchasing's progress during 2017

In June, LUPC's Board approved a new [Responsible Procurement Policy and Strategy](#) prepared by the LUPC Responsible Procurement Advisory Group, comprised of procurement professionals, sustainability managers and students drawn from the Membership. The Strategy sets out an ambitious programme of projects and actions, a number of which are aimed at addressing risks of human rights abuses, by which we will seek to demonstrate our commitment to its Policy and to Responsible Procurement in the sector. The Policy commits LUPC to joining our partner [Advanced Procurement for Universities and Colleges \(APUC\)](#) in using its [Supply Chain Code of Conduct](#).

Leading by example: LUPC's Modern Slavery Project

In late 2016, LUPC's Board committed funds for a project designed to explore ways of tackling human rights abuses in its supply chains. This has been developed in partnership with academics at the [Business, Human Rights and the Environment Research Group \(BHRE\)](#) in the School of Law at the University of Greenwich, led by Dr Olga Martin-Ortega, who was elected to the LUPC Board in 2015. The Project was commenced in January 2017 and entailed recruiting, on a fixed-term contract, a full-time resource from the retail sector with experience in supply chain risk assessment and mapping. LUPC provides advice and support to Ensemble Purchasing staff and the wider Membership on promoting respect for human rights in the supply chain and working with the supplier base to mitigate the risks of abuses. In November 2017, Ensemble Purchasing's Company Secretary delivered a Modern Slavery awareness briefing to senior staff at Trinity Laban Conservatoire of Music and Dance.

Building national practice: the HEPA Responsible Procurement Group

Alongside the [Higher Education Procurement Association \(HEPA\)](#), Ensemble Purchasing's Company Secretary helped establish a national Responsible Procurement Group for the HE sector, chaired by the Head of Procurement at the University of Manchester. Its aim is to collaborate closely with the national group and share developmental thinking.

Helping eradicate abuses in electronics supply chains: Continued support for Electronics Watch

LUPC renewed its affiliation to [Electronics Watch](#) in 2017, the collaborative organisation monitoring global electronics supply chains. LUPC has this year included supplier due diligence and monitoring clauses in the latest iteration of HE's National Desktop and Notebook Agreement, a £440m national supply agreement managed by LUPC. This gives LUPC contractual rights to enter into dialogue with suppliers on those issues and collaborate with them to establish due diligence and mitigation strategies to address human rights risks. In March 2018, LUPC's affiliation was extended to include all full Members, including all Ensemble Purchasing members.

In July, consultants from [Action Sustainability](#) assessed LUPC against the new [ISO 20400 guidance standard](#) for Sustainable Procurement. LUPC scored 3.71 out of a possible 5.00 and was [the first UK public sector organisation](#) and the world's first education sector body to undergo such an assessment.

Our plans for the future

LUPC and Ensemble Purchasing reconfirm their commitment to better understanding their supply chains and working towards greater transparency and responsibility towards people working on them. We will continue to work with our partners and suppliers to gain first-hand experience of supply chain due diligence and of mitigating the risks to human rights in our supply chains.

In 2017, LUPC was able to report on early success with Electronics Watch

In October 2015, Electronics Watch and its affiliates had learned about an NGO report on Wistron, a large server manufacturer in China, alleging serious labour rights violations including forced labour. Students were forced to perform an internship unrelated to their vocational aspirations as a requirement for graduation. In addition, the student workers reported working hours as much as 10-12 hours a day, six days a week and 48 hours of overtime a month, all in excess of local legal limits.

Electronics Watch responded by evaluating the evidence for the allegations and identifying, in specific terms, the risk of violations of Chinese law, the International Labour Organisation conventions, and the Electronics Watch Code of Labour Standards. Electronics Watch also recommended specific action for affiliates to take with their suppliers.

LUPC and other UK higher education purchasing consortia that purchase these servers contacted their account management representatives at each supplier, thus helping to spur action by the major brands purchasing the servers from the factory. All brands committed to temporarily halting student labour at the factory and ensuring compliance with the legal limits on student labour. In December 2016, Electronics Watch conducted follow-up offsite worker interviews and found no evidence of student labour.

Ensemble Purchasing's Goals for 2018

In the year ahead, we will continue our strategy to combat human rights abuses in our supply chains by fulfilling these **key goals for 2018**:

- Offering more Modern Slavery and Human Trafficking Awareness briefings for senior management and other groups among Ensemble Purchasing's membership;
- Continuing to use LUPC framework agreements for goods and services wherever deemed appropriate;
- Conducting **supply chain due diligence pilot projects** in cleaning and security services, with learning outcomes shared with our Members and partners;
- Starting with cleaning services, providing **Modern Slavery awareness training** for managers in both Members and suppliers in higher-risk spend categories; and
- Undertaking LUPC's **eLearning topics** on *Protecting Human Rights in the Supply Chain*, produced especially for public procurement practitioners.

This Statement has been approved and published by the Ensemble Purchasing Board and will continue to be reviewed at least once annually.



Judith Barber, Chair

Velocity 400 Limited, t/a Ensemble Purchasing

20 March 2018