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Modern Slavery and Human Trafficking Statement

1. Purpose

Abertay University is committed to upholding the principles of the [Modern Slavery Act 2015](#) and ensuring that modern slavery and human trafficking have no place in our operations or supply chains. This statement outlines our approach to identifying, preventing, and addressing risks related to modern slavery, reflecting our commitment to ethical conduct, integrity, and human rights.

2. Introduction

Modern slavery and human trafficking are serious criminal offences under the Modern Slavery Act 2015. While the Act primarily applies to England and Wales, certain provisions, such as the appointment of an Independent Commissioner and the seizure of ships, extend to Scotland. This statement focuses on Part Six of the Act, which addresses transparency in supply chains and is relevant to Abertay University's procurement practices.

In Scotland, the legal definition is further supported by the [Human Trafficking and Exploitation \(Scotland\) Act 2015](#). In essence, human trafficking involves the recruitment or movement of individuals for exploitation, including:

- Labour exploitation
- Sexual exploitation
- Domestic servitude

Modern slavery can occur in any part of an organisation's operations, both domestically and internationally. The University adopts a zero-tolerance approach and is committed to protecting and respecting human rights across all areas of its business.

3. Transparency in Abertay University Supply Chain

Under the [Procurement Reform \(Scotland\) Act 2014](#), Abertay University is already required to ensure transparency in our supply chains. Our procurement strategy outlines our objectives and annual performance reporting obligations.

To mitigate risk and uphold our values, we require all new suppliers to accept the [Advanced Procurement for Universities and Colleges \(APUC\) Supply Chain Code of Conduct \(Appendix A\)](#). This ensures alignment with our ethical standards.

While the complexity of global supply chains presents challenges, we expect all suppliers to adopt robust anti-slavery and human trafficking policies. Most of our suppliers are UK-based, and many meet the £36 million annual turnover threshold requiring them to publish a Modern Slavery Statement. We assess the risk of modern slavery in our direct supply chain as low.

Our due diligence includes:

- Requiring supplier commitment to the APUC Code of Conduct
- Ensuring suppliers with turnover above £36 million publish a Modern Slavery Statement
- Requiring smaller suppliers to demonstrate compliance with the APUC Code
- Monitoring high-risk sectors and supply pools
- Maintaining ongoing evaluation of existing and new suppliers

4. People working for the University

Abertay University's HR policies safeguard workplace rights and ensure rigorous checks on the right to work in the UK. Agency workers and contractors are sourced through vetted, reliable agencies in line with our procurement standards.

We are accredited by the Living Wage Foundation, guaranteeing that all directly employed staff receive the real living wage, with the exception of apprentices who are not required to be paid the Living Wage under accreditation rules. We also expect regular on-site contractors to be paid the UK living wage as defined by the Living Wage Foundation.

Abertay University is itself committed to the principles of Fair Work First in a manner proportionate to our size and operational context. These principles include fair pay, opportunity, security, fulfilment and respect, and ensuring effective worker voice. This reflects our wider commitment to ethical employment, equality, and sustainability, and underpins the standards we expect from our supply chain partners.

In line with Scotland's Fair Work First policy, the University evaluates suppliers' approach to fair work, including effective worker voice, no inappropriate use of zero-hours contracts, and action to tackle the gender pay gap, as part of our procurement and contract award processes in accordance with national procurement guidance.

5. Awareness and Communication

To promote awareness and compliance, this statement is shared with all University employees. We encourage staff to report concerns through our Public Interest Disclosure (Whistleblowing) Policy, which covers malpractice, criminal activity, and legal non-

compliance. Any suspected case of modern slavery will be investigated thoroughly under this policy.

Additional resources include:

www.gov.scot/policies/human-trafficking/ - Scottish Government's policy of Human Trafficking

www.gov.scot/publications/human-trafficking-resources/ - Scottish Government's information on Modern Slavery and Human Trafficking – available in multiple languages

[Modern Slavery Briefing](http://www.modernslaveryhelpline.org/)– Anti-Slavery website with various resources available

www.modernslaveryhelpline.org/media/audio-visual - Video presentation to assist in the identification of Modern Slavery.

[Modern Slavery Act 2015](#)– Modern Slavery Act 2015 Legislation

[Human Trafficking and Exploitation \(Scotland\) Act 2015](#)– Human Trafficking and exploitation (Scotland) Act 2015 Legislation

For confidential advice or to report concerns, contact the Modern Slavery Helpline at www.modernslaveryhelpline.org or call 0800 0121 700 (available 24/7).

6. Victim Safeguarding and Survivor Engagement

Abertay University recognises that safeguarding victims of modern slavery is an essential part of an ethical and responsible anti-slavery approach. Our priority is to ensure that, where possible, anyone directly employed by the University, or engaged through its activities can access appropriate support if concerns arise.

To strengthen our approach:

- We will ensure that the University's reporting routes clearly outline how concerns relating to modern slavery or trafficking can be raised or referred, including alignment with existing whistleblowing and safeguarding processes.
- We will expect our suppliers and contractors to maintain effective mechanisms for identifying, reporting, and addressing potential cases of modern slavery within their own operations and supply chain.
- Where a potential incident is identified within our own operations, we will seek advice from recognised support organisations and statutory bodies to ensure that any response is appropriate and proportionate to our role.
- We will explore opportunities to learn from individuals and organisations with lived experience of modern slavery to inform our policy and awareness activities, in a way that is proportionate to our size and capacity.

Our focus will remain on prevention, awareness, and appropriate escalation rather than direct case management.

7. Key Performance Indicators and Monitoring

To ensure transparency and continuous improvement, Abertay University will monitor key indicators of progress in implementing this statement.

Initial indicators will include:

- Percentage of Tier 1 suppliers assessed for modern slavery risk
- Number of suppliers required to submit compliance documentation or statements
- Progress in integrating modern slavery considerations with relevant policies and processes (e.g. procurement, recruitment, partnerships)
- Outcomes from policy reviews and risk assessments

These indicators will evolve over time as our understanding of risk and sector-wide good practice develops.

Training on modern slavery awareness will be incorporated proportionately into relevant processes and guidance rather than through stand-alone programmes, reflecting our context as a small, resource-limited institution.

8. International and Subsidiary Risk Oversight

Abertay University acknowledges that international partnerships, research collaborations, and subsidiary entities may present elevated risks related to modern slavery and human trafficking.

Abertay University will consider modern slavery and human rights risks as part of its international partnership due diligence. Where legal frameworks differ, the University will engage with partners to understand their context, assess risks proportionately, and agree on appropriate mitigations or assurances. Non-compliance with UK legislation will not automatically preclude partnerships, but identified risks will be evaluated and escalated through the appropriate governance route.

The University recognises that in some regions modern slavery or labour exploitation may be widespread due to social, economic or governance factors. In such cases, the aim of due diligence is to understand the level of risk, the partner's awareness, and their willingness to engage with improvement or mitigation measures rather than to seek full alignment with UK legislation. The University will therefore take a context-sensitive and proportionate approach, focusing on transparency, dialogue and ethical progress.

To address these risks:

- We will conduct risk assessments for international contracts and collaborations, particularly in jurisdictions with known human rights concerns.

- Subsidiaries and affiliated entities will be expected to align with and apply the principles of the University’s Modern Slavery Policy, in a manner proportionate to their operations and jurisdiction.
- We will review our investment policies to ensure that fund managers are actively assessing and mitigating modern slavery risks in their portfolios, in line with our Environmental, Social, and Governance commitments.

Where concerns arise within international or partnership contexts, the University will take proportionate action, such as raising awareness with the relevant partner and signposting to appropriate authorities or support agencies.

9. Reviewing the Statement

This statement will be reviewed periodically to ensure its effectiveness and updated in line with legislative changes and best practice developments.

10. Related Policy Documents and Supporting Documents

Legislation	Human Trafficking and Exploitation (Scotland) Act 2015 ; Modern Slavery Act 2015 ; Procurement Reform (Scotland) Act 2014
Strategy	Abertay University Strategy 2025-2030 ; Sustainable Development Strategy ; Procurement Strategy ; People Strategy ; International and Partnership Strategy
Policy	Staff Recruitment and Employment Policies; Purchasing and Procurement Manual; Sustainability Development Policy; Whistleblowing policy
Procedures	Procurement and Tendering Procedures; Recruitment and Right to Work Procedures
Guidelines	N/A
Local Protocol	N/A
Forms	N/A

11. Additional Information

Audience	Public
Applies to	All University Members
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