



Modern Slavery Act Statement

Author	Head of Procurement
Approved By	Senior Management Team
Approval Date	1 st December 2021
Review Date	Autumn 2022
Version	2021.1
Document Type	Policy
Activity/Task	University Governance/Procurement Compliance
Document Location	Procurement Intranet Page

Related Documents

Document	Purpose
Sustainability Development Policy	An overview of the commitment to sustainable development
Purchasing and Procurement Manual	To provide guidance to staff involved in purchasing goods, services and works on behalf of Abertay University
Human Resource/People Services Policies	Several HR/PS policies can be applied to the subject matter, all are located https://intranet.abertay.ac.uk/staff/people-services/
Whistleblowing policy	To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected

Version Control Table

Version Number	Purpose / Changes	Author	Date
2021.1	New Policy to comply with legislation	Head of Procurement	Autumn 2021

Contents

- 1. Purpose**
- 2. Introduction**
- 3. Transparency in Abertay University's Supply Chain**
- 4. People working for the University**
- 5. Awareness and Communication**
- 6. Reviewing the Policy**

1. Purpose

The purpose of this document is to ensure that Abertay University meets its obligations under the terms of the Modern Slavery Act 2015, ensuring that there is no modern slavery or human trafficking in the University's supply chain or any other part of its business.

This Policy reflects our commitment to acting ethically and with integrity in our business relationships in addition to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not tolerated in any part of its business.

2. Introduction

Modern Slavery and Human Trafficking is a criminal offence under the Modern Slavery Act 2015 (the Act).

In 2015, the UK government passed the Modern Slavery Act. The Act applies largely to England and Wales. Limited parts of the Act are enforceable in Scotland. The sections that apply in Scotland relate to the seizure of ships by relevant authorities, and the appointment of an Independent Commissioner. The matters in this policy refer to Part Six of the Act (Transparency in Supply Chains, etc.) as it relates to the procurement and supply chain management of the Abertay University.

A Practical Guide has been published by Westminster as guidance for how Part Six of the Act can be dealt with

<https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide>

The legal definition in Scotland is set out in the [Human Trafficking and Exploitation \(Scotland\) Act 2015](#). In simple terms it is trading adults and children for the purpose of personal gain or profit. It is a violation of human rights, preying on some of the most vulnerable in society. It often involves long-term exploitation and its effect on victims can be devastating.

Human trafficking is the recruitment or movement of people for the purposes of exploitation, including:

- labour exploitation;
- sexual exploitation; and
- domestic servitude.

Modern Slavery and Human Trafficking can occur in any part of a business, in all parts of its supply chain and in its own operations, both within the UK and abroad.

The Act requires organisations who meet certain criteria to publish an annual statement outlining steps taken by the organisation to ensure slavery & human trafficking is not taken place within the organisation or in any of its supply chains.

We at Abertay University are committed to the principles of the act to protecting and respecting human rights and have a zero-tolerance approach to slavery and human trafficking in all its forms.

3. Transparency in Abertay University Supply Chain

Under the Procurement Reform Scotland Act we already have a requirement to ensure that our supply chains are transparent. The Act requires us to set out in our strategies our approach to, and what outcomes we seek to deliver from our activity, along with the statutory duty to report annually on how we are performing in this regard.

To further identify and mitigate risk we require all new suppliers to accept the Advanced Procurement in Universities and Colleges (APUC) Supply Chain Code of Conduct (Appendix A), this ensures that our suppliers acknowledge and comply with our values.

The breadth, depth and complexity of our typical supply chain makes it challenging to manage these types of business and sustainability issues. Whilst respecting human rights in the supply chain is ultimately our supplier's responsibility, as the customer, we expect those in our supply chain to respect our values and to adopt suitable anti-slavery and human trafficking policies and practices.

The majority of our supply chains are currently UK based and a significant amount of our spend is with UK companies that have an annual turnover of over £36m and are therefore required to publish an annual statement under the Modern Slavery Act. As such, we have assessed the risk of slavery and human trafficking in our direct suppliers as low.

To ensure that we continue to assess our existing and new supply chains, our due diligence activities will include:

- Mitigate the risk of slavery and human trafficking in our supply chains through our commitment to APUC
- Identify and assess potential risk areas in our supply chain by requesting the supplier to commit to the APUC Supply Chain Code of Conduct.
- Ensure all suppliers of goods and services with a turnover in excess of £36m per year have published a Modern Slavery statement
- Suppliers with a turnover of less than £36m and who do not publish their own statements will be required to demonstrate their commitment to the APUC Supply Chain Code of conduct with respect to their organisation and their supply chain.
- Monitor potential risk areas in our supply chains and recognise the high-risk supply areas in industry and supply pools

4. People working for the University

Our HR/People Services policies set out workplace rights at the University. We are rigorous in checking that all new recruits have the right to work in the UK. Where it is necessary to hire agency workers or contractors, our staff are directed to specified, reliable agencies that have been vetted through the University's rigorous procurement procedures as set out above. The University is accredited by the Living Wage Foundation, which certifies that all staff are paid a real living wage. Non-University contracted workers that regularly work onsite at the University are expected to be paid the UK living wage as defined by the [Living Wage Foundation](#), and the University evaluates suppliers' approach to fair work practices, including the Living Wage, in line with statutory guidance.

5. Awareness and Communication

To ensure full awareness of, and compliance with, the Modern Slavery Act and the requirements, Abertay University will ensure this Statement is brought to the attention of all employees.

The University has a Public Interest Disclosure (Whistle-blowing) Policy to enable employees to raise concerns about malpractice including financial impropriety, criminal activity or failure to comply with legal obligations within the University. If a case of modern slavery were to be suspected, this would be fully investigated and dealt with under the policy.

Further information and guidance are available, below are links to some of that resource:

- 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](#) – 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

A Modern Slavery helpline is available online at www.modernslaveryhelpline.org or telephone 0800 0121 700. This helpline provides advice and information regarding modern slavery 24/7.

6. Reviewing the Policy

This policy will be monitored periodically by the University to judge its effectiveness and will be updated in accordance with changes in the law.