# Introduction & Purpose of the Statement

1. This statement is made pursuant to section [54 (Part 6) of the Modern Slavery Act 2015](http://www.legislation.gov.uk/ukpga/2015/30/section/54/enacted) and is intended to inform University staff, students and the general public of the steps taken by the University of Strathclyde during the financial year ending 31st July 2022 in relation to its obligations to mitigate the risk of slavery and human trafficking in any of its business activities.
2. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
3. Modern slavery is all around us, often hidden in plain sight. People can become enslaved making our clothes, serving our food, picking our crops, working in factories, or working in houses as cooks, cleaners or nannies. Victims of modern slavery might face violence or threats, be forced into inescapable debt, or have their passport taken away and face being threatened with deportation. Many people have fallen into this trap because they were trying to escape poverty or insecurity, to improve their lives and support their families.
4. The University of Strathclyde recognises that it has a responsibility to take a robust approach to slavery and human trafficking. This statement, produced annually, intends to demonstrate the University’s progressive approach in actions and commitment to understanding potential Modern Slavery risks related to its activities and to minimise the risk of slavery and human trafficking in its supply chains.

# The University of Strathclyde

1. The University of Strathclyde is a charitable body, registered in Scotland, with registration number SC015263. The University was established by Royal Charter in 1964, with a history dating back to 1796 and the founding of Anderson's Institute as ‘the place of useful learning’.  The University’s [Strategic Plan 2020-2025](https://www.strath.ac.uk/whystrathclyde/strategicplan/) confirms our vision as a leading international technological university inspired by our founding mission as ‘the place of useful learning’, making the world better educated, prosperous, healthy, fair and secure. We continue to live by our socially progressive values today, putting sustainability at the heart of our strategy through our commitment to deliver against the United Nations Sustainable Development Goals.
2. The University’s values capture our ethos: who we are, what we believe in and what we stand for. Our values set out how we conduct ourselves, how we expect to be treated as part of Strathclyde and how we engage with our partners. In delivering our Strategic Plan, and how we act and make decisions guided by these values:

|  |  |
| --- | --- |
| **People-oriented** | Committed to our staff and students, providing opportunities and investing in their development. |
| **Bold** | Confident and challenging about what we do, and supportive of appropriate and managed risk in our decision-making. |
| **Innovative** | Focused on discovering and applying knowledge with impact, and encouraging creative thinking and new ideas. |
| **Collaborative** | Working together, internally and externally, with integrity and in an open, respectful way. |
| **Ambitious** | For our institution, staff and students as well as supporting the ambitions of our partners. |

1. The University has a zero tolerance policy in relation to modern slavery and human trafficking. We are committed to conducting all business dealings and relationships in an ethical and transparent manner, and to implementing and enforcing effective systems and checks to ensure the University is not contributing to modern slavery in any way.

# Statement and Commitment

1. The University is committed to ensuring that modern slavery and human trafficking are not taking place in any part of its operation within the University and its supply chain. We are committed to protecting and respecting human rights across the University’s activities, and will take reasonable and appropriate steps to influence others to ensure slavery and human trafficking is not taking place, where it is possible to do so.
2. Our [People Strategy](https://www.strath.ac.uk/professionalservices/media/ps/humanresources/Strathclyde_People_Strategy_2025.pdf) underpins our commitment to workplace rights for employees and these are supported by our [Human Resources Policies](https://www.strath.ac.uk/professionalservices/staff/policies/hr/). We incorporate safeguarding into every area of University life, through our [Safe360](https://www.strath.ac.uk/whystrathclyde/safe360/) commitment to ensuring a work and study environment that does not condone unacceptable behaviours. The University [Induction checklist](https://eur02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fview.pagetiger.com%2Fyour-induction&data=04%7C01%7Cfiona.hughes%40strath.ac.uk%7C9258ac5356ac4c83f24408d9ebd6a924%7C631e0763153347eba5cd0457bee5944e%7C0%7C0%7C637800129522672360%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000&sdata=r%2BFA%2B0ji%2FCMTz9kJ0xbKXYD5uGBpo4gpnf3WHsOMmFA%3D&reserved=0) directs new staff members to our modern slavery statement, to raise awareness of our commitment, and our Public Interest Disclosure ([Whistleblowing) policy](https://www.strath.ac.uk/media/ps/strategyandpolicy/Public_Interest_Disclosure_Whistleblowing_Policy.pdf) is in place to enable staff to report improper conduct or unethical behaviour.
3. The University is accredited by the [Living Wage Foundation](https://www.livingwage.org.uk/), which certifies that all staff are paid the 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 First including the Living Wage, in line with the Scottish Government’s [statutory guidance](https://www.gov.scot/publications/fair-work-first-guidance-support-implementation/).
4. The University’s [Procurement Strategy](https://www.strath.ac.uk/procurement/) outlines our principles and approach to ensuring ethical procurement, such as the University’s [Sustainable Procurement Strategy](https://www.strath.ac.uk/procurement/), fairly and ethically produced products and fair working practices, including promoting payment of the [Scottish Living Wage](https://scottishlivingwage.org/what-is-the-real-living-wage/).

# Supply Chain Expenditure

1. The University has a non-pay annual expenditure of approximately £140m across Goods, Services and Works. Our supply chains fall under the following main categories:

* Estates, Buildings and Facilities Management
* Laboratory Equipment
* Professional Services
* Computer Supplies and Services
* Audio Visual Equipment
* Utilities

# Procurement Support for the Modern Slavery Act 2015

1. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Measures included within the [Public Contracts (Scotland) Regulations 2015](http://www.legislation.gov.uk/ssi/2015/446/contents/made) are embedded in all of our procurement activities and relevant Scottish Procurement Policy Notes ([SPPN 3/2020](https://www.gov.scot/publications/reducing-the-risk-of-human-trafficking-and-exploitation-in-the-performance-of-public-contracts-sppn-3-2020/)) are circulated to relevant staff and implemented where required.
2. In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free, we have embedded our obligations under the Modern Slavery Act 2015 in the [University’s Supplier Code of Conduct,](https://www.strath.ac.uk/procurement/informationforvisitorsandsuppliers/suppliercodeofconduct/) which underpins all tendering activity. The Code of Conduct demonstrates our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to mitigate the risk of slavery and human trafficking taking place in our supply chains. Organisations that we contract with must agree to the Supplier Code of Conduct as part of the obligations within that contract.
3. The University is a member of the Advanced Procurement of Universities and Colleges (APUC) consortium, and therefore endorses the [APUC supply chain code of conduct](http://www.apuc-scot.ac.uk/#!/sustain.php), which specifies that suppliers shall not use forced, involuntary or underage labour. Suppliers are encouraged to utilise the APUC database SUSTAIN where they can provide details of measures they take in relation to modern slavery in their supply chain.

# Identifying and Mitigating Potential Risk in Our Supply Chains



1. The risk of Modern Slavery in the University’s direct and local activities is considered low. However, we recognise the potential risks linked to the supply chain of goods and services we buy across the world. A large portion of these goods are bought through collaborative contracts, and we work with the relevant bodies to ensure anti-corruption activities are addressed during their procurement processes as well as in our own.

# During 2021, the University, as part of the Scottish Higher and Further Education Sector, has contracted with a company called [EcoVadis](https://ecovadis.com/) through APUC, to conduct part of our supply chain due diligence. EcoVadis has a well-developed methodology paired with a global team of expert analysts, which provides them with the ability to conduct individual sustainability performance assessments across all the relevant areas of our supplier/ supply chain community. Suppliers are selected to be invited on a risk-based approach per category.

# EcoVadis assess suppliers across 21 sustainability criteria in four themes, environment, labour & human rights, ethics and sustainable procurement, based on leading standards, such as GRI, UNGC, and ISO 26000 which allows for an in-depth supply chain due diligence. Actions for suppliers are created based on the outcome of the assessment. A scorecard is produced for the supplier with areas of good practice and areas to improve. APUC and member institutions have visibility of the scorecard and can request corrective actions in areas for improvement, which suppliers must respond to and are documented within the platform.  Further information can be accessed through the [buyer success hub.](https://resources.ecovadis.com/buyer-success-hub)



[Example Sustainability Scorecard](https://ecovadis.com/solutions/ratings/) – EcoVadis website.

1. The University is a member of [Electronics Watch](https://electronicswatch.org/en/), an independent monitoring organisation working to achieve respect for labour rights in the global electronics industry through socially responsible public purchasing in Europe.
2. The University Procurement uses the Scottish Government’s [Sustainable procurement tools](https://sustainableprocurementtools.scot/) and guidance where appropriate at strategy stage of our procurements.
3. Every regulated procurement process conducted by the University requires tenderers to disclose whether the bidder or any member of their organisation with decision-making powers has been convicted in the last five years of any offence under Part 1 of the Human Trafficking and Exploitation (Scotland) Act 2015, or under any provision referred to in the Schedule to that Act. Tenderers that confirm such a conviction will be excluded from the process unless they can successfully demonstrate that they have self-cleansed.
4. The University includes a clause within its General Terms and Conditions in relation to Modern Slavery. This outlines the obligations of the supplier in contracting with the University. It extends to due diligence procedures being in place for sub-contractors to that supplier. It references the requirement for suppliers to comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes (including the Modern Slavery Act 2015). The University reserves the right to terminate and seek recompense for any contract where the supplier is found to be in breach of the anti-slavery policy.

# Responsible Investment

1. The University has a considered responsible investment strategy in line with the University’s strategy and values. As a socially progressive institution, the responsible investment strategy considers a range of environmental, social and governance issues and informs any changes to the University’s investment portfolio.

# Research and Knowledge Exchange

1. We endeavour to ensure that all Strathclyde contracts for research and knowledge exchange projects contain robust provisions to guard against modern slavery and human trafficking, including a requirement that the parties to the relevant project comply with the Modern Slavery Act 2015 when carrying out their obligations.
2. All staff in our Grants and Contracts Team are aware of and have been briefed on modern slavery.

# Recruitment and International Office (RIO)

1. The University works with a carefully selected network of high-quality educational agents from across the world. The University’s agent partners counsel and support prospective students through the application process, assisting in the preparation and submission of documents for consideration to study at Strathclyde. Agent agreements are managed by RIO, and the team provide regular support and training to ensure agents are able to represent the University with the most up to date knowledge and authority. We endeavour to ensure that all Strathclyde contracts with our global agency partners contain robust provisions to guard against modern slavery and human trafficking, including a requirement that the relevant agent will comply with the Modern Slavery Act 2015 when carrying out its obligations.
2. Regular due diligence checks and formal reviews are conducted on an annual basis for all approved agent partners. As part of this process regular briefing and training sessions are provided, which includes familiarisation with and understanding of the Modern Slavery Act 2015.

# Alumni and Development

1. We undertake a robust due diligence process to capture a variety of identified possible risks and illegal activities for single gifts and cumulative gifts reaching £25k or above. These come from companies, trusts, foundations and individuals and are checked to ensure compliance with the [Strathclyde Supporter Promise](https://www.strath.ac.uk/alumni/givetostrathclyde/strathclydesupporterpromise/), which verifies that gifts are not donated through illegal activities or associated with oppressive regimes.
2. Donors will sign a Gift Agreement which states that the donor must adhere to the University’s Modern Slavery and Human Trafficking Statement.  We will not accept gifts from the proceeds of crime or unethical sources.

# Leases/Licences and Rented Properties

1. As a general rule, all University standard style Leases which are procured via the University’s retained legal advisors contain standard provisions to the effect that any illegal activity on the part of a tenant on the Lease premises is not permitted and is a ground for termination of the Lease.  This would extend to modern slavery.
2. In addition to the foregoing protection, the University’s Estates Department would ordinarily undertake through the due diligence process the following actions:

* + Request references from proposed new tenants, if possible and if relevant.  Poor references or no references is looked into and more thoroughly questioned, where possible.
  + If proposed Tenant is vague about the use of the premises, then detailed information on proposed use must be given for approval.  This is standard practice from Estates Services.
  + Offering to pay in advance, out with the market norm, is again something that we would be alerted to within Estates Services.
  + More detailed diligence into tenants before letting to areas which are particularly susceptible to modern slavery such as:  cash based businesses, such as cleaning, car wash, nail bars, barbers, construction and maintenance, beauty/spa and transport and freight.  This diligence would include, for example, more detailed diligence on beneficial ownership of complex structures.
  + A request for evidence of a landlord’s own modern slavery statement/policy in their administration of the annual service charge budget is made.

1. Where the University is a tenant in a property, and a service charge is payable, it would also be good practice to request that the landlord or their managing agents provide their own modern slavery statement/policy.  This can be requested at times of proposed new leases and lease renewals.

# Training and Awareness



1. Awareness of modern slavery and human trafficking is subject matter that the University’s security team are cognisant of. They can identify evidence of activity and can take measures to escalate where necessary. It is included in Induction and training material.
2. The University’s Procurement function continues to commit to undertaking all relevant training and awareness sessions, including the Sustainable Procurement training by APUC.
3. The Deputy Director of Finance, Procurement (DDFP) and the Head of Procurement Reporting and Governance have recently engaged with the National Human trafficking Unit within the Serious Crime Division of Police Scotland, to work with the University to deliver awareness sessions on identifying unusual and potentially criminal behaviour with regards to Modern Slavery and Human Trafficking. This training will be developed and delivered during 2023.

# The DDFP has prepared a short presentation which is accessible through the University [Procurement webpage](https://www.strath.ac.uk/procurement/) called Modern Slavery Training 2022, to raise awareness and be included in the University’s induction training and accessed by appropriate staff until more formal training is developed.

1. Further online training is identified and staff across the university are encouraged to complete this training to raise their awareness of risks in the community.

The Scottish Government has the following training available via their website:

<https://www.gov.scot/policies/human-trafficking/>

and the home Office - includes videos to demonstrate examples of what to look out for in identifying Human Trafficking:

<https://www.gov.uk/government/publications/modern-slavery-training-resource-page/modern-slavery-training-resource-page#training-and-awareness-raising-resources>

# Key Measures

1. Noted below are the Key Measures against which the University can demonstrate progress in relation to its obligations to mitigate the risk of slavery and human trafficking in any of its business activities.

|  |  |  |  |
| --- | --- | --- | --- |
| Key Measure | Action | Target | 2022 |
| Procured contracts that are issued on University standard T&C's | The University operates with a No PO No Pay Policy and our POs include standard clauses.  Clause 26 covers MS | 100% | 99% |
| Procured Contracted Suppliers engaged with Modern Slavery | Engaged through the University’s Supplier Code of conduct | 100% | All Procured, contracted suppliers sign up to the supplier code of conduct. |
| Spend with Suppliers providing information on the EcoVadis database | Compare end of year spend with suppliers to suppliers signed up and reviewed by EcoVadis | >50% | 13% |
| Known reported Modern Slavery cases in the University's direct areas of influence | Security Services have added a suspicion or incident category to their SIRIS database for reporting. | 0 | 0 |
| No. of reported cases resolved | Update from Security Services | ALL | - |
| No. of staff trained on Modern Slavery risks | Launch training in 2023.  Sign posting to information sites which include guidance and training are included in the Modern Slavery statement. | All appropriate Staff will be trained on how to recognise and report suspicions of MS. | Modern Slavery statement development group and Procurement Team. |
| Percentage of gifts and donations over £25k that have been subject to due diligence procedures. | Confirmation of completeness from Alumni Dept. | 100% | 100% |
| Percentage right to work pre-employment screenings undertaken. | Confirmation of completeness from HR | 100% | 100% |
| Collaborations with others | Collaborate with APUC, Electronics watch, EcoVadis and others across the Public Sector. | | | |

Louise McKean

University Compliance Officer

January 2023