

# Introduction

1. 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.
2. The University of Strathclyde recognises that it has a responsibility to take a robust approach to slavery and human trafficking. This statement sets out the University’s 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.
3. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps the University has taken and will take in relation to slavery and human trafficking.

# 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 2015-2020 confirms our vision as a leading international technological university inspired by our founding mission as ‘the place of useful learning’, making a positive difference to the lives of our students, to society and to the world.
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:

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| **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 partner. |

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 is 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 [Human Resources Policies](http://www.strath.ac.uk/equalitydiversity/policies/) outline our commitment to workplace rights for employees of the University and we promote our [Dignity and Respect Policy](http://www.strath.ac.uk/media/ps/humanresources/policies/DignityandRespectPolicy.pdf) to create an environment that does not condone unacceptable behaviours. A [Whistleblowing policy](http://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’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 Living Wage.

# Supply Chain Expenditure

1. The University has a non-pay annual expenditure of approximately £100m 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.
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 Supply Chain Code of Conduct, 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 ensure slavery and human trafficking is not taking place anywhere in our supply chains. The University’s Code of Conduct can be accessed through the [Procurement Manual](https://www.strath.ac.uk/procurement/).
3. Where relevant, suppliers sign up to 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.
2. 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. This Code of Conduct details the consortium members’ and suppliers’ duties in corporate social responsibility and sustainable areas across the supply chain.
3. The University has joined 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.
4. The University uses the Scottish Government’s Sustainable [Public Procurement Prioritisation Tool](https://www2.gov.scot/About/Performance/scotPerforms/partnerstories/SustainablePublicProcurementPrioritisationTool) (SPPT) where appropriate at strategy stage of our procurements.
5. 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.
6. The University has inserted 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. During 2018 we began reviewing our investments with our investment managers, the possible approaches to responsible and sustainable investing.  During 2019, we are aiming to agree and implement initial changes to our investment approach.

# Research and Knowledge Exchange

1. We ensure that all Strathclyde contracts for research and knowledge exchange projects stipulate that the parties to the relevant project will 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.

# Alumni and Development

1. We undertake due diligence for single gifts and cumulative gifts reaching £25k or above from companies; trusts and foundations and individuals to ensure compliance with the gift acceptance policy to ensure gifts are not donated through illegal activities or associated with oppressive regimes. We will not accept gifts from the proceeds of crime or unethical sources.

# Training and Awareness

1. The University’s Procurement function continues to commit to undertaking all relevant training and awareness sessions, including the Sustainable Procurement training under development by APUC.
2. The Head of Procurement has engagement with the Police Scotland Detect and Deter section within the Safer Communities Unit to work with the University to deliver awareness sessions on identifying unusual and potentially criminal behaviour and prevention of Serious and Organised Crime.
3. The training hosted by the University in collaboration with APUC and Police Scotland was offered across the Higher and Further Education Sector in June 2018.

Dr Veena O’Halloran

University Secretary and Compliance Officer

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