

## **Modern Slavery Statement**

### **Our Approach**

The University of the West of Scotland (UWS) is committed to combatting modern slavery and human trafficking in all its forms. We will uphold human rights and abide by the principles of the Modern Slavery Act 2015.

We take steps not only to minimise the risk of slavery in our own organisation but also in our supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31<sup>st</sup> July 2018. We will review this statement annually.

### **Overview of UWS**

UWS is a “body corporate” under the terms of a statutory instrument. The University’s constitutional basis is contained within the Order of Council 2015. Our governing body is the University Court.

The University is organised into five academic Schools for learning, teaching and research spread across four campuses in the west of Scotland and one in London.

Our purpose is to change lives, transform communities and encourage enterprise through outstanding, distinctive and higher education. Our focus is on personalised learning experiences supported by internationally recognised research. UWS graduates will be work-ready and contribute locally and globally.

### **Minimising Risk in our Organisation**

#### Awareness

We inform staff of our zero-tolerance approach to slavery and human trafficking by circulating our Modern Slavery Statement in the UWS e-bulletin each year. To further promote understanding and awareness, the Legal Services Team will also roll out a series of

compliance workshops to staff this year, which will include a segment on the Modern Slavery Act.

In 2019, Equality and Diversity Workshops, covering the University's commitment to upholding human rights, will be made available to staff.

Procurement Regulations & Sustainability training is available through APUC (Advanced Procurement for Universities and Colleges) and will be completed by all members of our Procurement team by the end of 2018.

### Policy and Procedural Framework

We publish a number of policy statements, underpinned by procedures and guidance documents, which support our commitment to human rights and set out steps that we will take to combat modern slavery and human trafficking. This University's policies and procedures have been comprehensively reviewed in 2018 and include our:

- Corporate Governance Policy Statement
- Procurement Protocol
- Procedures for Raising Concerns
- Donations Procedure
- Due Diligence Procedure
- People and Organisational Development Policy Statement
- Equality, Diversity and Human Rights Procedure and Guidance

### Workplace Rights

Our commitment to workplace rights is set out in our People and Organisational Development Policy Statement. We also publish a range of procedures setting out our approach to well-being at work, diversity and inclusion; and health and safety.

We comply with all pay related legislation including the UK national minimum wage.

Rigorous right to work checks are carried out for all new members of staff. When it is necessary to engage agency workers, we encourage all staff to use recruitment agencies who have met our rigorous procurement procedures.

Our Health and Safety team ensure that our campuses are safe places to work and oversee our compliance with health and safety legislation.

### Raising Concerns

We adhere to the Public Interest Disclosure Act 1998 and encourage all staff to report possible wrongdoing or malpractice within the University. The process for making a disclosure is set out in our Procedures for Raising Concerns. An individual who raises concerns under this Procedure will be protected from any reprisals.

### Donations

Before accepting any charitable donations, we carry out a number of checks to ensure that the funds do not come from unethical sources. The donation will then be subject to approval by our Donations Group, Vice Chancellor's Executive Group or the University Court depending on its monetary value. Further information is set out in our Donations Procedure.

### Due Diligence

We carry out due diligence on all prospective international partners to ensure that their values align with ours and that the partnership does not present an unnecessary risk to the University. Further information is set out in our Due Diligence Procedure.

We enter a contract with all international partners that requires them to put in place procedures, investigations and compliance systems to ensure that they are fully compliant with the Modern Slavery Act.

### International Agents

We engage agents around the world to recruit students on behalf of UWS. All agents are required to sign our Agency Recruitment Agreement that includes a clause asking the agent to confirm that it will adhere to all of the University's policies and procedures. This year, we will add a clause to our template Agency Recruitment Agreement requiring the agent to confirm their compliance with the Modern Slavery Act 2015. We will also raise awareness of our zero-tolerance approach to modern slavery and human trafficking with prospective agents by including a link to this Statement in our new agent application form.

### **Minimising Risk in our Supply Chains**

We purchase a wide range of goods and services from suppliers including:

- ICT equipment and services
- Professional services

- Residential services
- Estates and facilities management goods and services
- Food and catering supplies
- Books and printing
- Laboratory supplies
- Furniture and stationery
- Waste and recycling services

Procuring goods and services from suppliers linked to supply chains across the world presents risks of slavery and human trafficking. We believe that this risk is minimised due to the checks that we carry out on our suppliers.

#### Procurement Protocol

Our Procurement Protocol sets out the approach that we take when procuring goods and services. The purpose of this Protocol is to ensure that all staff approach procurement in a way that is legally compliant and which minimises the risk of modern slavery and human trafficking in our supply chains.

#### APUC

Much of our procurement of goods and services is carried out through the APUC (Advanced Procurement for Universities and Colleges) Ltd Framework of which UWS is a member. APUC requires all suppliers to adopt their Supply Chain Code of Conduct which confirms that it does not use forced, involuntary or underage labour, provides suitable working conditions and treats employees fairly.

#### TUCO

Our Catering and Events Team are committed to sustainable procurement and working with ethical suppliers. To help to achieve this aim, the Team conduct their procurement through TUCO (The University Caterers Organisation) Ltd. Through the TUCO framework, the University has recently introduced new suppliers, who align with our values, into the catering outlets on our campuses.

#### Modern Slavery Certificate

For procurement that does not take place through the APUC framework (exceeding £50,000 for goods and services and £350,000 for works), this statement is included with all tender documents and potential suppliers are required to complete and sign our Modern Slavery

Certificate. This Certificate requires tendering suppliers to set out the measures that they take to ensure that slavery and human trafficking does not take place in their own organisation or supply chains.

### Electronics Watch

We are a member of Electronics Watch, an organisation that works to ensure good working conditions in factories producing Information and Communication Technology (ICT) goods bought by public sector members across Europe.

### **Breaches**

We will thoroughly investigate any allegations of potential modern slavery or human trafficking in our own organisation or in our supply chains. This applies to allegations made through the Procedures for Raising Concerns or by other means.

In the event of a serious breach by a supplier, we reserve the right to terminate our relationship with them.

Our Disciplinary Procedure and the accompanying staff guidelines identify a breach of agreed University policies and procedures as an example of misconduct. If a member of staff is found to have behaved in a way that is not compatible with this statement or any of the policies or procedures which support it, we will take disciplinary action, up to and including dismissal.

### **Our Effectiveness in Combatting slavery and Human Trafficking**

We will regularly review the effectiveness of the measures set out in this statement in combatting slavery and human trafficking.

### **Approval**

This statement was approved by the University Court on 11 February 2019 and is signed below by the University's Principal and Vice-Chancellor.



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Professor Craig Mahoney  
Principal and Vice-Chancellor

Date: 26.02.2019