

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. The purpose of this statement is to set out the steps that we have taken in the last financial year, as well as setting out some of our upcoming plans.

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 31st July 2020. 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 2019. Our governing body is the University Court.

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

Our Purpose

Through inspired teaching, we will improve the lives of those who study at UWS, and enable them to improve the lives of others. We believe in excellent, relevant and purposeful research which will underpin our strategic growth. UWS is a civic university – it is an anchor institution within the communities in which it is based, with impact that reaches beyond our campus regions.

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 twice a year. To further promote understanding and awareness, the Legal Services Team make training on modern slavery available to all staff. The next sessions are scheduled to take place in December 2020. The online training module 'Working with the Modern Slavery Act' was also made available in November 2020.

Equality and Diversity workshops, covering the University's commitment to upholding human rights, have been rolled out in 2019/20 as part of our Leadership Development and Women's Leadership programmes. Inclusion Essentials training has also been delivered to over 200 staff in 2019/20.

Procurement Regulations & Sustainability training is available through APUC (Advanced Procurement for Universities and Colleges) and has been completed by all members of the Procurement Team. All members of the Procurement Team have also completed the HEPA training on Protecting Human Rights in the Supply Chain.

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 are reviewed each year and include our:

- Corporate Governance Policy Statement
- Procurement Protocol
- Procedures for Raising Concerns
- Donations Procedure
- Due Diligence Procedure
- People and Organisational Development Policy Statement

A comprehensive review of the University's Equality, Diversity and Human Rights framework (including our Procedure, Guidance and Equality Impact Assessment process) has taken place and is currently under consultation with relevant stakeholders.

The above policies and procedures are available on the 'Policies, Procedures and Guidance' section of the UWS website.

Employment

Our commitment to employment 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.

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. Our Due Diligence Procedure, guidance and checklists inform staff of the steps which must be followed before entering into a new partnership.

In 2019/20, we designed and implemented a process for conducting interim due diligence on our existing international partners to ensure that they continue to meet these standards.

We enter a contract with all international partners that requires them to put in place procedures, investigations and systems to meet the standards set out under the Modern Slavery Act.

International Agents

We engage agents in Asia, Africa, North America and Australia to recruit students on behalf of UWS. All agents are required to sign our Agency Recruitment Agreement. In 2019/20, we added a clause to this Agreement requiring all agents to confirm that they have read the University's Modern Slavery Statement and agree to take all reasonable steps to ensure that there is no modern slavery in their own organisation or in their supply chain. We have also significantly reduced the number of international agents that we work with and they have been issued with these new terms and conditions.

Minimising Risk in our Supply Chains

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

- IT 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

We procure goods and services of the qualifying value 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.

Scottish Government Sustainable Public Procurement Prioritisation Tool

We use the Sustainable Public Procurement Prioritisation Tool which supports organisations to consider the social, environmental and economic of future purchases.

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.

Coffee Conscience

All coffee sold in UWS' catering outlets is fair trade and purchased through Coffee Conscience who source ethical produce and support community initiatives globally.

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.

Ethical Investments

The University's investments are guided by the parameters set down in our Ethical Investment Statement. Under this Statement, we commit to investing in companies who mirror our ethical values and aims. We also specifically avoid direct investment in specific industries such as Tobacco, arms and the extraction of oil and gas.

United Nations Sustainable Development Goals

The University is committed to the UN's 17 Sustainable Development Goals including Goal 8 'Decent Work and Economic Growth' and Goal 10 'Reduced Inequalities.' In 2020, UWS published a comprehensive overview of its actions and outcomes related to sustainability and in 2020 will review the UWS Sustainability Plan 2016-2020, following the launch of the UWS Strategy 2025. Strategy 2025 sets ambitious sustainability goals to 'reduce our emissions and become net zero by 2040' and to become a 'stand-out university committed to tackling the UN Sustainable Development Goals.'

Breaches

We would 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.

No cases of modern slavery or human trafficking have been reported within the University or our supply chains to date.

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.

The University's Internal Audit Team carried out an audit of our compliance with the Modern Slavery Act in 2019/20 and the findings of this audit were positive. These findings were presented to the Audit and Risk Committee in January 2020.

Approval

This statement was approved by the University Court on 25 November 2020 and is signed below by the University's Principal and Vice-Chancellor.

A handwritten signature in black ink, appearing to read 'C Mahoney', written in a cursive style.

Professor Craig Mahoney
Principal and Vice-Chancellor

Date: 27.11.20