

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 2021. 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 on request. Legal Services delivered virtual training in 2020 to staff involved in recruiting international students; including those working with international recruitment agents and overseas partners..

The following online training modules covering modern slavery directly, trafficking or human rights were also made available to staff in 2020 and 2021:

- Working with the Modern Slavery Act;
- Inclusion essentials;
- Unconscious bias;
- Gender based violence.

Equality and Diversity workshops, covering the University's commitment to upholding human rights, were delivered virtually in 2020/2021 as part of the Leadership in Management and Women's Leadership programmes. Equality training was also made available to students.

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

In April 2021, we launched our Equality, Diversity and Human Rights Code. This followed an extensive review of our previous policy, procedure and guidance in this area. We have also published our new Equality Impact Assessment Toolkit, designed to support colleagues to assess the potential impact of our decisions, policies and practices on groups who share protected characteristics. This new suite of documents strengthens the university's approach to upholding human rights.

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.

Our Procurement Team oversee the appointment of recruitment agencies used to fill employment vacancies. When it is necessary to engage an agency, the Procurement team will identify the appropriate Framework Agreement entered into by APUC, the Scottish Government or other UK procurement consortia. This ensures that the University only uses recruitment agencies who have been appointed by these bodies following a rigorous tender process.

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.

In late 2021, we also launched the Report and Support Tool to all staff and students. This online platform enables individuals to report issues of concern either anonymously or by identifying themselves. They can also seek support through the tool from both internal and external services if they are experiencing difficulties themselves.

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. This approach is set out in our Donations Procedure that has been reviewed in 2021 to ensure that our approvals process is both rigorous and consistent with that of other universities in the UK.

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.

We conduct interim due diligence on our existing partners to ensure that they continue to meet these standards. In 2020/21, we carried out interim due diligence on thirteen partners.

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. This Agreement contains a clause 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 Compliance Statement

The Procurement Team previously issued a Modern Slavery Certificate to potential suppliers as part of the tender process. Suppliers were required to sign this Certificate, confirming that they would take steps to ensure that there was no modern slavery in their organisation. It was however identified by the Procurement Team that one-off payments and lower spends (below £25k for goods and services/below £100k for works) were not captured in this process.

From 31 September 2021, the Procurement Team have rolled out a new Modern Slavery Compliance Statement to all new suppliers. This Statement was created in conjunction with Legal Services. The Statement is included in all invitations to tender, new supplier forms and non-competitive actions. This amended process ensures that

all new suppliers are required to demonstrate their commitment to eradicating modern slavery, regardless of level or frequency of spend.

To ensure that existing suppliers meet their commitments in relation to the Modern Slavery Act, the Procurement Team have implemented a new review process for 2021/22. This involves identifying a percentage of suppliers (through the Spikes Cavell Annual Spend Report) each year and reviewing their Modern Slavery Statements against the 'Modern Slavery Checker' created by the Chartered Institute of Procurement and Supply. This Checker helps organisation to ensure that their suppliers are taking the necessary steps to make their supply chain more transparent. The Procurement Team may request further evidence of compliance from the supplier as required.

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.' The UWS Principal and Vice-Chancellor, Professor Craig Mahoney and Professor Milan Radosavljevic, Vice Principal Research and Engagement have both signed the UN Sustainable Development Goals Accord in 2021. . The UWS 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.

Approval

This statement was approved by the University Court on 23 November 2021 and is signed below by the University's Principal and Vice-Chancellor.



Professor Craig Mahoney
Principal and Vice-Chancellor

Date: 16/12/2021