

## **Glasgow Caledonian University**

### **Modern Slavery and Human Trafficking Statement**

#### **1. Introduction**

- 1.1 Glasgow Caledonian University (the University) is a higher education establishment that employs approximately 1600 staff members, teaches in the region of 20,000 students and purchases around £21m per annum of goods, services and works through various supply chain arrangements. The University is a registered charity: No:SC021474.
- 1.2 The University has a zero tolerance policy in relation to modern slavery and human trafficking. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure the University is not contributing to modern slavery in any way. In accordance with Section 54 part 6 of the Modern Slavery Act 2015 this statement sets out the steps the University has taken in the financial year 2017-18 to ensure that it is not contributing to modern slavery through its business dealings and relationships.
- 1.4 This statement has been approved by the University Court who will review and update it annually.

#### **2. Supply Chain**

Our supply chains fall under the following main categories:

- Professional Services
- ICT Equipment and Services
- Estates and Facilities Management Goods and Services
- Library Resources
- Audio Visual equipment
- Laboratory Equipment

#### **3. Due Diligence Processes**

To date the University has taken the following measures to identify, assess and mitigate potential risk areas in its supply chain:

- GCU is committed to carrying out procurement activities in an environmentally, socially, ethically and economically responsible manner and to entering into agreements and contracts with suppliers that share and adhere to its vision. We have adopted a Supply Chain Code of Conduct, which requires our suppliers to state that they do not use forced, involuntary or underage labour, that they do provide suitable working conditions and terms and treat employees fairly. To demonstrate this commitment, all current and potential suppliers are asked to acknowledge their compliance with the principles of the Supply Chain Code of Conduct, with respect to their organisation and their supply chain.
- Our Invitation to Tender template includes sustainable procurement statements which require contractors to ensure they comply with current legislation in relation to the Equality Act 2010, Minimum Wage Regulations, Working Time Regulations, Health & Safety at Work Act and Modern Slavery Act.

- We utilise a number of tools, which allows us to undertake supply chain analysis in terms of modern slavery, for example the Scottish Government Sustainable Procurement Prioritisation Tool and the Global Slavery Index.

#### **4. Training**

- Procurement staff completed face-to-face training and e-learning modules on sustainable procurement which raises awareness of Modern Slavery in the supply chain.
- Procurement staff attended a training event on Serious Organised Crime, which highlighted Modern Slavery linked to potential criminal behaviour.
- The requirements of the Modern Slavery Act are addressed at the induction for procurement staff.

#### **5. Actions for Financial Year 2018/2019**

The Procurement Strategy, in line with the Procurement Reform (Scotland) Act 2014, was updated and published on the University Website in July 2018. The role of a responsible procurement champion will be allocated to a senior role within the procurement team and they will be responsible for driving implementation of the Sustainable Procurement Policy. The Sustainable Procurement Policy requires that consideration is given to the environmental, social, legislative and economic consequences for design, materials used, manufacturing methods, logistics and disposal of any procurement decisions. We as a University understand that we have an important role to play in sourcing in a manner which looks to remove the use of modern slavery practices. The Sustainable Procurement Policy will set out how we intend to further address these issues throughout the supply chain.

As Glasgow Caledonian University is a member of Advanced Procurement for Universities and Colleges (APUC) which is the procurement centre of expertise for the higher and further education sector in Scotland, we directly benefit from work that APUC has undertaken.

- APUC has a web tool, 'Sustain' which assesses supplier compliance against the Supply Chain Code of Conduct including Social compliance, Ethical and Economic compliance and Environmental compliance. GCU Procurement, through a prioritisation exercise, has identified suppliers in the key, high risk category areas of Estates and IT, and will encourage them to sign up to Sustain to assess their compliance.
- APUC has undertaken a refresh of the prioritisation exercise on all collaborative framework agreements which they lead on, to identify areas where Modern Slavery may be occurring and to take appropriate action to ensure that these framework agreements exclude the use of modern slavery practices. GCU Procurement continues to promote the use of these framework agreements within the institution and as such we can be confident that our supply chain has been analysed when contracting under these agreements. We will look to increase reliance on these collaborative frameworks which will reinforce the compliance with our policies.
- APUC became the first full consortium member of Electronics Watch, whereby GCU, as an APUC member, has full access to Electronics Watch benefits. Electronics Watch is an independent monitoring organisation working to achieve respect for labour rights in the global electronics industry through socially responsible purchasing in Europe. GCU continues to work with APUC to monitor our supply chains.

Where possible, within our own tenders/contracts, we will continue to address areas of concern for modern slavery direct in the tendering process through minimum standards, specification and contract management.

GCU will continue to use the Prioritisation Tool and apply this to all its contracts and categories (where APUC has not already done so). The tool enables a buyer to assess the risks and opportunities across various areas (including labour concerns) for a commodity or category. GCU will further increase its understanding of sustainability risks associated with each category. GCU Category Leads will continue to work with APUC Category Managers to facilitate embedding APUC responsible supply chain guides into future tendering activities within the Institution.

GCU Procurement will participate in further Sustainable Procurement training developed by APUC, as well as continuing to attend any relevant training offered by other third parties.

**Professor Pamela Gillies CBE FRSE**  
**Principal & Vice Chancellor**

Statement approved by University Court 27 September 2018