



Heriot-Watt University Modern Slavery and Human Trafficking Statement

Statement at End of 2015/16 Financial Year (ending 31st July 2016)

Introduction

Purpose of the statement

The University recognises that it has a corporate responsibility to respect the human rights of those affected by its activities and business relationships. This statement documents Heriot-Watt University's response to the [Modern Slavery Act 2015](#) (MSA) and specifically to section 54 (1). It is designed to inform staff, students, industry partners and the general public about the steps Heriot-Watt University has taken over the last financial year, to safeguard its supply chain from modern slavery and human trafficking activities.

In particular, it provides information about:

- the University's structure, its business and its supply chains;
- its policies in relation to slavery and human trafficking;
- its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
- the training about slavery and human trafficking available to its staff.

Heriot-Watt University's obligations under the Modern Slavery Act 2015.

Heriot-Watt University is one of Scotland's 19 Higher Education institutions, specialising in Science, Technology, Engineering and Mathematics. With three Scottish campuses and headquartered in Edinburgh, it has a long tradition of welcoming students from all over the world. With some 23% of its student population originating from overseas and 12% from the EU, it is regarded as Scotland's most international University.

The University's annual turnover exceeds the current threshold of £36m above which commercial organisations are required to publish a statement under the Act¹; however, the University would in any event consider it has a responsibility to set out the steps it is taking to eradicate modern slavery from its supply chains.

¹ Section 54 (2) of the Modern Slavery Act 2015.

Heriot-Watt University and Sustainable Procurement

All the University's institution-specific tendering is carried out by Procurement Services, part of the Governance structure of the University, with responsibility for overseeing all non-pay expenditure. It is therefore ideally placed to ensure that procurement activity is conducted in an ethical and sustainable manner. Social, environmental and economic factors are addressed through sustainability audits and supply chain improvement programmes, in accordance with the Sustainable Procurement Duties enshrined in the Procurement Reform (Scotland) Act.

In 2016 the University Executive and the University's governing body, Court, approved the institution's 2016-18 Procurement Strategy and Operational Plan and associated Sustainable Procurement Policy. These incorporate its sustainable procurement objectives, strategy, code of conduct and the tools to embed or enhance sustainable objectives in all procurements run by the University.

Sustainable procurement tools used by the University include its tender documentation, which includes full sustainable procurement references and a Modern Slavery Act compliance questionnaire; supplier prioritisation tools based on the DEFRA Marrakech tool and the Scottish Government's own updated tools; and use of the Flexible Framework developed by the [UK Sustainable Procurement Task Force](#), to assess our suppliers' social, ethical, environmental and economic standards. Using this data and our buying power, we can prioritise areas of risk and seek opportunities to influence positive behavioural change.

Procurement Services adopts a category management approach to its non-pay spend, which allows it to develop an in-depth category understanding and an appropriate risk management approach. As part of the Flexible Framework process, key suppliers are targeted for intensive development, and sustainability audits and supply chain improvement programmes put in place, with achievements formally recorded.

In 2016 we formally adopted the APUC² Supply Chain [Code of Conduct](#). To assess suppliers' compliance with the Code, APUC has developed a web-based assessment tool called [SUSTAIN](#), which is linked to the contracts database containing contracts/agreements used by Heriot-Watt. The website assesses suppliers at three achievement/compliance levels in social, ethical, economic and environmental areas. The assessments are carried out by SA8000 trained staff. The tool enables Procurement Services to view the status of University suppliers, and for sub-tier suppliers to be linked and assessed.

Sustainable Procurement Training

The University's CPO has attended bespoke Modern Slavery Act training delivered by the Law Department, University of Greenwich, and the Operational Procurement Team have similarly attended MSA workshops at the APUC 2016 conference. The University's Head of Operational Procurement is also part of an APUC working group established to define guidance for the new BT14 (Sustainability Based Benefits) key performance indicator.

Electronics Watch

APUC is a Founder Member of [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. APUC's Head of Development & Sustainability sits on the board of Electronics Watch, which helps inform the various ICT contracts let or endorsed by APUC. Via the APUC consortia membership, Heriot-Watt will in future be named as a member institution of Electronics Watch on the Electronics Watch website

² APUC Limited, the Scottish Higher Education Centre of Procurement Expertise.

Actions for the next Financial Year

Heriot-Watt's Procurement Services intends, after further familiarisation with the web-based 'Sustain' tool, to ramp up supplier assessment activity. The prioritisations undertaken so far against our institution-specific contracts give essential structure to the selection of our higher risk suppliers for this process.

Procurement Services staff will undertake prioritisation of the ca. 100 term contracts let by Procurement Services on behalf of the University, to understand the key risks and opportunities for each agreement, which includes possible labour concerns.

The data from the prioritisations will be shared with the contract end-users to aid in their risk awareness.

Procurement Services will make available new APUC category guides, as and when these become available, and share these across the University's Procurement Network.

Procurement Services will promote any relevant training and guidance offered by other parties, such as that offered by [HEPA](#), the Higher Education Procurement Association.

Ann Marie Dalton-Pillay

Secretary of the University

This statement has been approved by the University Executive who will review and update it annually.