

Modern Slavery Statement 2022-2023

Approved By	Board of Governors	Status	Approved
Date Approved	March 2024	Version	7
Statement Owner	Director of Finance	Date of Next Review	January 2025

Version Number	Purpose/Change	Date
1	Publication of Modern Slavery Statement in response to Modern Slavery Act (2015) legislation requiring an annual statement.	2017
2	Annual review of Modern Slavery Statement conducted, and amendments made to include Whistleblowing information and Human Resource Policies.	2018
3	Annual review of Modern Slavery Statement conducted, and amendments made to the layout and to include information on the structure of the University, due diligence, and staff training.	2019



4	Annual review of Modern Slavery Statement conducted, and amendments made to the layout into standard template and updated figures for financial year, procurement policy and staff training information.	June 2020
5	Annual review of Modern Slavery Statement conducted, and amendments made to update figures for financial year, and revised information on tools available to Procurement	June 2022
6	Annual review of Modern Slavery Statement conducted, and updates made to sections on Organisation Structure (2), EcoVadis (5.6) and staff training (6).	January 2023
7	Annual review of Modern Slavery Statement conducted, and updates made to figures for financial year, and sections 4.4, 5.4 (due diligence) and 6 (staff training).	January 2024

MODERN SLAVERY STATEMENT

1. Modern Slavery and Human Trafficking Statement 2022-23

1.1 RGU is committed to establishing practices to combat slavery and human trafficking. This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and sets out the steps that the University has taken during the financial year ending 31 July 2023 to ensure that slavery and human trafficking are not taking place in our supply chains or in any part of our business. This statement is reviewed annually.

2. Organisational Structure

2.1 RGU delivers a high-quality vocational education and relevant curriculum which provides learners with the skills they require to thrive throughout their careers. As a result, the University has a reputation for producing graduates that are highly sought after by employers. Over the last decade RGU has consistently had one of the best records of any UK University for graduate level employment. It celebrates a high-quality student experience and is currently ranked in the top three universities in Scotland for student satisfaction in the National Student Survey. It has been named as the Scottish University of the Year 2021 in The Times & Sunday Times Good University Guide, 2021.

2.2 RGU has a heritage going back 250 years and was awarded University status in 1992. Throughout its development, the University has remained committed to creating equal opportunities to access a relevant and valuable education. It is made up of eleven schools and offers over 300 courses ranging from engineering, architecture, computing, and life sciences to the creative industries, health and social care, and business. It has a student population of over 16,500, who study on-campus and online; notably, it is one of the largest

providers of online learning in the UK. Courses are developed through close collaboration with employers, professions, and industry to address skills regional and national needs, and this ensures that curriculum is demand-led.

- 2.3 The University is making significant investment to grow its globally impactful research in key areas including sustainable transport; built environment visualisation; industrial biotechnology; smart data and artificial intelligence; and pharmacy practice. Through prioritising strategic research partnerships, the University fosters excellence in knowledge exchange and interdisciplinary collaboration. RGU is known for its close engagement with industry and has a significant track record in workforce development both nationally and internationally. It collaborates with organisations, governments, trade bodies, industry associations and educational institutions to stimulate innovation and drive economic development.
- 2.4 The strategic direction of the University is determined by a Board of Governors with day-to-day operational management the responsibility of the Principal & Vice Chancellor who is supported by an Executive. The University refreshed its [strategy](#) in 2022, which was developed to reflect significant changes in the internal and external environment while recognising and building on the strengths that make RGU distinctive. The organisational structure of the University can be found on its [website](#).
- 2.5 RGU employs a central procurement team of three FTE which includes the following roles: one each of Procurement Manager, Senior Procurement Adviser and Procurement Adviser. Overall, the team managed a combined impactable spend of approximately £29.5 million in 2022-23.

3. Supply Chains

- 3.1 The University is a member of the [Advanced Procurement for Universities and Colleges](#)



[\(APUC\)](#) Ltd, the procurement centre for expertise for Scotland's Universities and Colleges. The University benefits from its close links with APUC in a number of areas within sustainable procurement.

- 3.2 We contract with our suppliers for works, goods and services in each of the five categories aligned to APUC's category structure:
 - 3.2.1 Estates & Facilities
 - 3.2.2 Information Services (ICT & Libraries)
 - 3.2.3 Laboratories
 - 3.2.4 General Professional Services and HR
 - 3.2.5 Responsible Procurement
- 3.3 A significant proportion of our procurement is with suppliers who are pre-approved either by a purchasing consortium or through public tenders managed by our procurement team. In relation to vetted suppliers, we use collaborative framework agreements put in place by APUC or other sectoral and national procurement consortia.

4. Policies on Modern Slavery

- 4.1 We are committed to acquiring goods and services for our use without causing harm to others and are committed to acting ethically and with integrity in all our business relationships.
- 4.2 Our policy framework includes policies to ensure that the University does not support practices of modern slavery in any way. The values of the University are outlined within our [Ethics Policy](#), making clear that there is a zero-tolerance approach in relation to modern slavery and human trafficking. The University aims to be a transparent institution and as



such has an established policy to protect whistle-blowers raising concerns about any aspect of the University's business including slavery and human trafficking.

- 4.3 The [University's Procurement Policy](#) was reviewed and updated and now encompasses the former Sustainable Procurement Policy under the Responsible Procurement section. This increase in scope now also includes environmental and human rights.
- 4.4 The Procurement Manager sits on the RGU Sustainability Group, the remit of which includes reviewing and revising the [Environmental and Sustainability Policy](#) to address anti-slavery and human trafficking within this where appropriate.
- 4.5 The University's standard Terms and Conditions relating to the Purchase of Goods and Services includes specific clauses that aim to ensure supplier compliance with anti-slavery and human trafficking laws. These address the need for suppliers to maintain policies to ensure compliance with the law, and to implement due diligence procedures with their sub-contractors (and other participants in their supply chains), to ensure there is no slavery or human trafficking within their supply chains.

5. Due Diligence Processes, Risk Assessment & Management, and Measuring Effectiveness

- 5.1 The University has adopted tools and practices from APUC to address modern slavery and human trafficking. For all open tenders with a contract value above the Scottish Government threshold, the University uses the [APUC Supply Chain Code of Conduct](#) (whose principles cover Social, Ethical and Environmental Compliance as well as Economic Development); potential suppliers are asked to acknowledge their compliance with the principles of the Code in regulated procurement exercises.
- 5.2 In addition, the University uses the Single Procurement Document (SPD) for all regulated



procurements; the SPD contains a compliance question for bidders, relating to criminal convictions in child labour and other forms of human trafficking. In completing this, bidders declare that they have not committed any offence under Part 1 of the Human Trafficking and Exploitation (Scotland) Act 2015 or under any provision referred to in the Schedule in that Act.

- 5.3 As RGU uses many national and sectoral framework agreements to let contracts, it is also relevant that APUC has undertaken prioritisation on approximately 180 framework agreements either led or promoted by APUC, to understand the key sustainable procurement risks and opportunities for each agreement, which includes possible labour concerns. This helps APUC to assess which agreements and suppliers should be audited on compliance with its code of conduct.
- 5.4 APUC has been using Section 1 of its Supply Chain Management (SCM) tool to verify that its contractors have published Modern Slavery statements in line with the Modern Slavery Act 2015. The RGU procurement team now have access to the APUC Supply Chain Management tool and will have the ability, using Section 1, to verify that its contractors have published Modern Slavery statements in line with the Modern Slavery Act 2015.
- 5.5 To assess suppliers' compliance with the Supply Chain Code of Conduct, the RGU procurement team has access to Sustain - the APUC web-based assessment tool which links to the contracts database containing contracts/agreements used by the whole sector. 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 within APUC's Development and Sustainability team and the tool enables the RGU procurement team to view the status of their suppliers, and for sub tier suppliers to be linked/assessed.
- 5.6 By virtue of its membership of APUC, RGU is a Consortium Affiliate 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.

- 5.7 APUC, the procurement centre of expertise for the Scottish HE/FE sector, has chosen EcoVadis, a global Corporate Social Responsibility rating company based on international standards, to conduct individual sustainability performance assessments across all relevant areas of our supplier / supply chain community. This platform has been set up across the sector, facilitated and paid for by APUC, and RGU Procurement have begun rolling this out across our suppliers, starting with those linked to our annual Contract Management programme of some 30 of our key and strategic suppliers. The system will support work in partnership to eradicate modern slavery and tackle the climate crisis, among other benefits.

6. Training for Staff

- 6.1 Buyers continue to be routinely made aware of free access to the HEPA (Higher Education Procurement Association) eLearning module on “A Guide to Modern Slavery”.
- 6.2 The University’s Procurement Adviser has undertaken Serious Organised Crime (SOC) awareness training through the Scotland Excel Academy and has produced a key learning points document from this, to be circulated to buyers for wider awareness.
- 6.3 The procurement team has received training on the use of the EcoVadis portal and database.

7. Review

- 7.1 This statement will be updated on an annual basis.