

Modern Slavery Statement 2020 – 2021



Approved by	Board of Governors	Status	Draft
Date Approved	June 2022	Version	5
Statement Owner	Director of Finance, VP of Strategy and Planning, University Secretary and VP Corporate Services	Date of Next Review	August 2022

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, updated figures for financial year, and revised information on tools available to Procurement.	June 2022

MODERN SLAVERY STATEMENT

1. Modern Slavery and Human Trafficking Statement 2020-21

- 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 2021 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 has a mission to transform people and communities by providing demand-led teaching and research to contribute to economic, social and cultural development regionally, nationally and internationally. It is made up of twelve 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 16,000, who study on-campus and online. It is one of the largest providers of distance learning in the UK. Courses are developed through close collaboration with employers, professions and industry to address skills needs, and this ensures that curriculum is demand-led. The University has a significant track record in skills and workforce development both nationally and internationally. 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 organisational structure of the University can be found on its [website](#).

- 2.2 RGU employs a central procurement team of three FTE which includes the following roles: one each of Procurement Manager, Senior Procurement Adviser and Procurement Administrator. Overall the team managed a combined impactable spend of approximately £14.5 million in 2020-21. Spend during this financial period was less than projected due to a reduction in purchasing activity in response to COVID-19 and the temporary closing of the University.

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 Senior Procurement Adviser sits on the RGU Sustainability Advisory Group, the remit of which includes reviewing and revising the [Environmental and Sustainability Policy](#), and the Procurement Policy to address anti-slavery and human trafficking within these 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 To assess suppliers' compliance with the Code, 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.
- 5.5 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.
- 5.6 Following discussions with APUC and other institutions in the HE Sector, the RGU Procurement team have planned to take part in a pilot group next year utilising a sustainability ratings agency called Ecovadis. Through the agency, APUC and member institutions will invite suppliers to register and complete a questionnaire, which is then assessed by EcoVadis. Suppliers are appraised on four areas, including Labour & Human Rights. Once assessment is complete, suppliers are provided a scorecard and corrective action plan. They are then reassessed at a later date to monitor progress. Scorecards and action plans can be viewed by APUC and members, allowing for a more thorough understanding and awareness of suppliers' practices.

6. Training for staff

- 6.1 Buyers are 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 had planned on holding an on-campus event with Police Scotland to raise awareness of Serious Organised Crime and Business Exploitation. Again however, due to COVID-19, this has been postponed to an appropriate time in the next financial year.

7. Review

7.1 This statement will be updated on an annual basis.



Robert Gordon University,
Garthdee Rd,
Aberdeen AB10 7AQ