

Modern Slavery Act 2015

University of the Highlands and Islands Modern slavery and human trafficking statement

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to improving our practices to combat slavery and human trafficking.

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 August 2018.

Organisational structure

We are an integrated university encompassing further and higher education. We are based in the Highlands and Islands of Scotland and are a partnership of 13 independent colleges, and research institutions.

We have a global annual turnover of £110 million.

Our supply chains

The University has a non-pay annual expenditure of approximately £10m across Goods, Services and Works. Our supply chains fall under the following main categories:

- Estates, Buildings and Facilities Management
- Laboratory Equipment
- Professional Services
- Computer Supplies and Services
- Audio Visual Equipment
- Utilities

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

Our workplace policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective

systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Identifying and Mitigating Potential Risk in Our Supply Chains

1. The risk of Modern Slavery in the University's direct and local activities is considered low. However, we recognise the potential risks linked to the supply chain of goods and services we buy across the world. A large portion of these goods are bought through collaborative contracts, and we work with the relevant bodies to ensure anti-corruption activities are addressed during their procurement processes as well as in our own.
2. The University is a member of the Advanced Procurement of Universities and Colleges (APUC) consortium, and therefore endorses the APUC Supply Chain Code of Conduct. This Code of Conduct details the consortium members' and suppliers' duties in corporate social responsibility and sustainable areas across the supply chain.
3. The University has joined 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.
4. We utilise the Scottish Government's Sustainable Public Procurement Prioritisation Tool (SPPT) where appropriate at strategy stage of our procurements.
5. Every regulated procurement process conducted by the University requires tenderers to disclose whether the bidder or any member of their organisation with decision-making powers has been convicted in the last five years of any offence under Part 1 of the Human Trafficking and Exploitation (Scotland) Act 2015, or under any provision referred to in the Schedule to that Act. Tenderers that confirm such a conviction will be excluded from the process unless they can successfully demonstrate that they have self-cleansed.
6. The University has inserted a clause within its General Terms and Conditions in relation to Modern Slavery. This outlines the obligations of the supplier in contracting with the University. It extends to due diligence procedures being in place for sub-contractors to that supplier. It references the requirement for suppliers to comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes (including the Modern Slavery Act 2015). The University reserves the right to terminate and seek recompense for any contract where the supplier is found to be in breach of the anti-slavery policy.

Training

University staff will receive sustainable procurement training from APUC and other parties as appropriate. This will include training on 'Sustain', APUC's web-based assessment tool. The tool assesses suppliers at three compliance levels (social, ethical, economic and environmental). 'Sustain' should enable the University to consider the sustainability status of certain of its suppliers.

The procurement team will complete the CIPS on line training module "Ethical Procurement and Supply" on an annual basis.

A handwritten signature in black ink, appearing to read "Niall Malt". The signature is written in a cursive, slightly slanted style.

UNIVERSITY OF THE HIGHLANDS AND ISLANDS

Date: March 2019

