

Modern Slavery & Human Trafficking Statement

2020-21

Approving authority:	University Executive
Consultation via:	Global Operational Executive
Approval date:	February 2022
Effective date:	February 2022
Review period:	Annually
Responsible Executive:	Finance Directorate
Responsible Office:	Procurement Services

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Modern Slavery & Human Trafficking Statement Heriot-Watt University 2020-21

Heriot-Watt is a specialist, pioneering University with a global presence, world-renowned innovative research and highly employable graduates, and a history dating back to 1821. Our vision is to be world-leading within all our areas of specialism, creating and exchanging knowledge that benefits society.

Through 'Strategy 2025', Heriot-Watt is driving forward as an international university which places students and staff at the heart of everything we do. Our strategy is to continue to build our international presence and impact through our campuses and partnerships, focusing on our strengths in learning and teaching and research.

Heriot-Watt has a reach that is truly international and we are a powerful driver of the global economy. We operate across five campuses in the UK, Middle East and South-East Asia, and have diverse communities of learners, scholars, professionals and partners from over 160 countries around the world.

1. PURPOSE

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, setting out the steps that Heriot-Watt University has taken during the financial year ending 31st July 2021 to ensure that modern slavery and human trafficking is not taking place in our supply chains or any part of our own operations.

2. OUR STRUCTURE AND ACTIVITIES

Heriot-Watt is a specialist, pioneering University with a global presence, world-renowned innovative research and highly employable graduates. Our vision is to be world-leading within all our areas of specialism, creating and exchanging knowledge that benefits society.

Through **Strategy 2025**, Heriot-Watt is driving forward as an international university which places students and staff at the heart of everything we do. Our strategy is to continue to build our international presence and impact through our campuses and partnerships, focusing on our strengths in learning and teaching and research.

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Procurement Services supports the University in achieving its ambitions by delivering procurement solutions to facilitate excellence in research, education and enterprise in a socially responsible way. As a truly global university, Procurement Services recognises that we make a significant, sustainable and socially responsible contribution to the world.

3. OUR COMMITMENT

The University recognises that modern slavery is a significant global human rights issue. Our commitment starts from protecting human rights and taking action to prevent slavery and human trafficking in all forms. The University acts ethically and with integrity in all of our global relationships. We use all reasonable

endeavours to take action directly and within our sphere of influence to ensure slavery and human trafficking is not taking place.

The University Executive and the University's governing body, Court, approved the Institution's Procurement Strategy and Action Plan, and associated Sustainable Procurement Policy. These documents incorporate the University's sustainable and ethical procurement objectives, actions and tools, used to embed or enhance our objectives in the University's procurements.

4. OUR SUPPLY CHAINS

The University buys goods, services and works in accordance with public procurement legislation. Our wide range of purchases include: construction works; workshop supplies; furniture; electronics including computers and audio visual; travel services; laboratory and research supplies including equipment, chemicals and pharmaceuticals; books and printing; professional services.

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.

A large percentage of the University's spend is with suppliers who are vetted and approved either by collaborative framework agreements or through tenders managed by our Procurement Services team.

The risk of modern slavery in our direct activities is likely to be low as a result of the controls and systems that the University has in place. However, we recognise that there are potential risks of modern slavery occurring related to our international activities, particularly in high-risk countries. Procurement Services works with colleagues in other universities, procurement bodies and government agencies to inform and mitigate risks.

5. IDENTIFYING AND MITIGATING POTENTIAL RISK IN OUR SUPPLY CHAINS

The University is committed to acquiring goods and services for use without causing harm to others. We are committed to acting ethically and with integrity in all of our business relationships. The University has adopted tools and practices from the Scottish Government and Advanced Procurement for Universities and Colleges (APUC) to address modern slavery and human trafficking.

For all Regulated Procurements, a procurement strategy is developed to ensure any environmental, social or economic risks are mitigated with the commodity/service. The University also uses a template tender document which includes full sustainable procurement references and a Modern Slavery Act compliance question.

Every regulated procurement process conducted by the University requires tenderers to disclose whether the tenderer 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 of the Act. Tenderers that confirm such a conviction will be excluded from the process unless they can successfully demonstrate that they have self-cleansed.

Further, the University issues a Supply Chain Code of Conduct, the principles of which cover social, ethical and environmental compliance as well as economic development. Suppliers are required to adhere to this Code of Conduct.

As the University uses many national and sectoral framework agreements to let contracts, it is also relevant that APUC has undertaken prioritisation on 187 framework agreements either led or promoted by APUC. This is 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.

The Procurement Services team participate in training events, engage with the sector at conferences and briefings and attend webinars to increase awareness and understanding of Modern Slavery and Human

Trafficking. We continue to share and communicate knowledge and risks to relevant stakeholders and devolved buyers across the University.

6. 2020-21 YEAR IN SUMMARY

Procurement Services staff continued to share best practice to stakeholders and devolved buyers across the University in order to continue to raise awareness of modern slavery and human trafficking risk at the University.

The University continued to address modern slavery direct in the tendering process through minimum standards, specification and contract management.

In November 2020, the University updated its new supplier registration process for the UK campuses. All new University suppliers are now being asked to adhere to the University's Supply Chain Code of Conduct. This revised on-boarding process will ensure that all new suppliers, irrespective of contract value, sign-up to our Supply Chain Code of Conduct (rather than restricted to regulated contracted suppliers).

Procurement Services adopted its revised Standard Terms and Conditions of Contract in December 2020, which included a new clause in relation to Modern Slavery. This clause outlines the obligations of the supplier in contracting with the University and references the requirement for suppliers to comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes. The University will reserve the right to terminate for any contract where the supplier is found to be in breach of the anti-slavery policy.

In 2020-21, there were no requirements to terminate business with any suppliers on the grounds of contravention of the Modern Slavery Act.

7. NEXT STEPS FOR 2021-22

The University will continue to address modern slavery direct in the tendering process through minimum standards, specification and contract management.

The University will re-assess areas of concern around modern slavery with identified supply categories, suppliers and their supply chains where appropriate. Category Managers plan to undertake analysis of 'at risk' supply chains as part of their Category Analysis and Category Plan development.

Procurement Services will adopt APUC's Supply Chain Management (SCM) portal to verify that its suppliers have published Modern Slavery statements in line with the Modern Slavery Act 2015. APUC conducts an assessment of its suppliers' compliance with the Supply Chain Code of Conduct through Section 2 of its Supply Chain Management (SCM) tool (previously "Sustain"). This will be on a risk-based approach per category. Actions are created based on the outcome of the assessment. In relation to modern slavery, these look at a variety of topics, including recruitment processes, employment terms, and workforce breakdown. The actions are shared with all Procurement Managers in the sector that have a contractual relationship with that supplier.

The Procurement Services team will attend refresher training to ensure all members have comprehensive awareness of Human Rights and the risks associated with each commodity category, in particular the HEPA 'A Guide to Modern Slavery' and the CIPS 'Ethical Procurement and Supply' e-learning module.

Procurement Services will continue to raise awareness of modern slavery and human trafficking issues across the University's communities through its stakeholder training programme and its communication plan.

Procurement Services will launch a new Procurement Policy in September 2021, which will include a revised contractual review process. No supplier terms and conditions can be accepted unless otherwise agreed and reviewed by Procurement Services. Further, Procurement Services will complete a risk assessment to ensure that the appropriate legal expertise is sought to manage the University's contractual

risk. As such, Procurement Services will ensure there is coverage in regards to modern slavery in supplier terms and conditions, where appropriate.

Where appropriate, the University will supplement our own efforts with activities already being progressed by APUC. Refer to [APUC Modern Slavery and Human Trafficking Statement](#) for reference.