



## **Modern Slavery and Human Trafficking Statement**

The Robert Gordon University 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 constitutes the university's modern slavery and human trafficking statement for the financial year ending 31<sup>st</sup> July 2018.

The university has an established policy to protect whistleblowers raising concerns about any aspect of the University's business including slavery and human trafficking. The university ethics policy makes clear that the university has a zero tolerance policy in relation to modern slavery and human trafficking. The university sustainable advisory group was relaunched and has met several times since October 2017. Their remit includes revising the university Sustainable & Environmental Policy and the Responsible Procurement Policy, to include anti-slavery and human trafficking within these where appropriate. Key university staff have received training related to the university's responsibility under the Modern Slavery Act 2015 and the steps that can be taken to ensure that no working practices which amount to slavery, servitude, forced or compulsory labour or human trafficking are taking place within its supply chains.

The university supply chains include suppliers registered under purchasing consortia, estates contractors, suppliers of equipment and related services and other professional advisors. The university takes its responsibility in relation to the Modern Slavery Act 2015 seriously and aims to ensure that no working practices which amount to slavery, servitude, forced or compulsory labour or human trafficking are taking place within its supply chains. The university has adopted the Advanced Procurement for Universities and Colleges (APUC) Ltd Supply Chain Code of Conduct and potential suppliers are asked to acknowledge their compliance with the principles of the Code in regulated procurement exercises. The procurement team held a buyers event in March 2018, which included a training session on the APUC buyers portal. The portal contains guidance and tools which will assist with buying responsibly, and has an e-learning module on Sustainable Procurement which can be accessed by all buyers.

The university uses the European Single Procurement Document (ESPD) for all regulated procurements which contains a compliance question for bidders, relating to criminal convictions in child labour and other forms of human trafficking.

The university has in place a robust suite of human resources policies designed to both ensure compliance with UK employment law but also to provide additional benefits to staff. The university is therefore confident that no working practices which amount to slavery, servitude, forced or

compulsory labour or human trafficking take place within its own business. The procurement and legal offices are currently reviewing the university standard Terms and Conditions relating to the Purchase of Goods and Services, which will include 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 their sub-contractors (and other participants in their supply chains), to ensure there is no slavery or human trafficking in their supply chains.

The Robert Gordon University is a member of APUC Ltd, the procurement centre of expertise for Scotland's universities and colleges. The university's senior procurement advisor is a member of the APUC sustainable procurement leaders group, which considers all key issues related to sustainable procurement. The Robert Gordon University is a consortium affiliate to Electronics

Watch, an independent monitoring organisation which works to achieve respect for labour rights in the global electronics industry through socially responsible public purchasing in Europe.

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 2018/19, in addition to continuing the work outlined above, we will focus on further supplier engagement in the area of responsible procurement, including through the Sustain database and face to face events.