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# Modern Slavery & Human Trafficking Statement

2023-24

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## Modern Slavery & Human Trafficking Statement Heriot-Watt University 2023-24

*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 31<sup>st</sup> July 2024 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.

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. While the Modern Slavery Act is UK legislation, Heriot-Watt will apply the principles of this act to the University and all members of the Heriot-Watt Group in so far as these are not incompatible with local legislation. All references to the University should be read as references to the University and members of the Heriot-Watt Group.

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 185 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. 2023-24 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.

All new University suppliers are required 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 previously been restricted to regulated contracted suppliers.

Our Standard Terms and Conditions of Contract include a 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 reserves the right to terminate any contract where the supplier is found to be in breach of the anti-slavery policy.

A revised supplier onboarding process has been developed which includes a 13 point risk assessment, in which Modern Slavery risks will be assessed for every supplier.

In 2023-24, there were no requirements to terminate business with any suppliers on the grounds of contravention of the Modern Slavery Act.

## 7. ACTION PLAN FOR NEXT FINANCIAL YEAR

In 2024/25 we will focus on the following;

- Integrate modern slavery due diligence as part of our contract management activities and implement new tool for sustainability performance of supply chain (EcoVadis).
- Trial the Electronics Watch contract conditions in upcoming ICT contracts.
- Implement a number of key performance indicators to measure progress on modern slavery diligence.
- Continue to address modern slavery directly in the tendering process through minimum standards, specification and contract management.
- 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.
- 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, and annually thereafter.

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.