



Modern Slavery Statement

This is the Modern Slavery Statement for the University of the West of Scotland for the financial year ending 31st July 2024. It is made pursuant to section 54 of the Modern Slavery Act 2015.

Our Organisation

The University of the West of Scotland (“UWS”) is a “body corporate” under the terms of a statutory instrument. UWS’ constitutional basis is contained within the Order of Council 2019. Our governing body is the University Court.

UWS is organised into four academic Schools for learning, teaching and research spread across four campuses in the west of Scotland and one in London. We employ approximately 1650 members of staff.

We have a zero tolerance approach to modern slavery and human trafficking. This Statement sets out the measures that we have taken to prevent these practices from taking place in our own organisation and in our supply chains.

Our Supply Chains

We purchase a wide range of goods and services from suppliers including:

- IT equipment and services
- Professional services
- Residential services
- Estates and facilities management goods and services
- Food and catering supplies
- Books and printing
- Laboratory supplies
- Furniture and stationery
- Waste and recycling services

Identifying and Managing Risk in Our Organisation

Our Staff

Our commitment to employment rights is set out in our People and Wellbeing Policy Statement.

Rigorous right to work checks are carried out for all new members of staff to ensure that they are legally entitled to work in the UK.

We pay all UWS staff and contractors engaged directly by the University at least the Real Living Wage, as set by the Living Wage Foundation and are accredited as a Living Wage Employer from Living Wage Scotland.

When it is necessary to fill employment vacancies using recruitment agencies, our Procurement Team oversee the procurement process and identify the appropriate Framework Agreement entered into by APUC, the Scottish Government or other UK procurement consortia. This procurement is undertaken in accordance with the Procurement (Scotland) Regulations 2016 to ensure transparency, accountability and the following of due diligence.

Raising Awareness

We inform staff of our zero-tolerance approach to slavery and human trafficking by circulating our Modern Slavery Statement to staff in the UWS e-bulletin. Legal Services have provided training to student facing teams in 2024 to raise awareness of the risk of modern slavery and human trafficking in relation to students.

Optional in-person or virtual training on modern slavery is currently available to all staff on request. We will explore the option to offer an online awareness raising session to all staff in the next financial year.

From 2024, the University's Head of Procurement is provided by the APUC Institutional Procurement Services Team. APUC is the Centre of Procurement Expertise for Universities and Colleges in Scotland and offers access to industry best practice on sustainable procurement including tackling modern slavery in supply chains. Members of the Procurement Team have undertaken Procurement Regulations & Sustainability training through APUC (Advanced Procurement for Universities and Colleges) and HEPA training on Protecting Human Rights in the Supply Chain. The Team undertakes regular industry specific training.

The 'Introduction to UK Culture' presentation which is delivered to new international students when they join the University includes content on fair working practices. The purpose of this is to raise awareness of what employment protections are in place in the UK to help international students to recognise abuse in the labour market. We will take steps to raise awareness of this issue with the wider student population in the next financial year.

Donations

Before accepting any charitable donations, we carry out a number of checks to ensure that the funds do not come from unethical sources and keep a record of the due diligence that has been carried out. The donation will then be subject to approval by our Donations Group, Vice Chancellor's Executive or the University Court depending on its monetary value. We regularly our Donations Procedure and the due diligence that we carry out on proposed donations. In 2024, we published a new Donations Checklist setting out the checks that are carried out by our Fundraising & Alumni and Legal teams before a donations is presented for approval.

Reporting Concerns

The University adheres to the Public Interest Disclosure Act 1998 and encourages all staff to report possible wrongdoing or malpractice within the University. We publish a Public Interest Disclosure (Whistleblowing) Procedure which informs staff how to raise concerns and what protection they will receive when doing so.

Speakup@uws.ac.uk is available as a confidential email address for staff to report concerns to.

The Report and Support Tool is available to all staff and students. This online platform enables individuals to report issues of concern either anonymously or by identifying themselves. They can also seek support through the tool from both internal and external services if they are experiencing difficulties themselves.

Identifying and Managing Risk in Our Supply Chains

APUC

We procure goods and services of the qualifying value through APUC (Advanced Procurement for Universities and Colleges) Ltd framework agreements. APUC requires all suppliers to adopt their Supply Chain Code of Conduct, which confirms that it does not use forced, involuntary or underage labour, provides suitable working conditions and treats employees fairly.

An example of these frameworks is TUCO which is used by our Catering and Events Team to ensure that good purchased for sale on our campuses is sourced from ethical suppliers.

Coffee Conscience

All coffee sold in UWS' catering outlets is fair trade and purchased through Coffee Conscience who source ethical produce and support community initiatives globally.

Electronics Watch

We are a member of Electronics Watch, an organisation that works to ensure good working conditions in factories producing Information and Communication Technology (ICT) goods bought by public sector members across Europe.

Sustain Supply Chain Code of Conduct

Our Procurement Team requires current and potential suppliers to commit to responsible and sustainable procurement within their organisations and their supply chains and to confirm their compliance with the Sustain Supply Chain Code of Conduct. This Code of Conduct has been collaboratively developed and reviewed by a range of stakeholders including the Sustain Project, APUC and equivalent centres of procurement expertise (LUPC, HEPA, EAUC), procurement and sustainability representatives from higher and further education, the National Union for Students and People & Planet. This Code of Conduct requires the supplier to take specific steps in relation to fair working practices and ensuring that they do not engage in modern slavery.

Procurement Due Diligence

The Procurement Team carry out due diligence at the following stages of the procurement process:

- The modern slavery risk profile of a procurement exercise is assessed at the strategy stage;
- Potential suppliers must complete the Single Procurement Document at the qualification stage (this covers child labour and human trafficking);
- Potential suppliers must complete Evaluation Criteria and Technical Questions at the tender stage. The questions included in this will depend on the risk profile of the procurement exercise but in all cases will include at least one question on responsible procurement;
- When a contract is awarded, the supplier must now commit to completing a Supply Chain Management Portal Section 1 questionnaire. This includes questions about the supplier's modern slavery statement or equivalent policies.

Annual Review of Suppliers

The Procurement Team carry out an annual review of our suppliers' compliance with the Modern Slavery Act. A selection of suppliers are identified through the Spikes Cavell Annual Spend Report and their Modern Slavery Statements are reviewed against the 'Modern Slavery Checker' created by the Chartered Institute of Procurement and Supply. This Checker helps organisation to ensure that their suppliers are taking the necessary steps to make their supply chain more transparent.

International Activities

The contracts that we put in place with our international student recruitment agents include a clause requiring the agent to confirm that they have read this Statement and commit to taking steps to ensure that there is no modern slavery or human trafficking in their own organisation or supply chains. We now also ask prospective agents about this when they are applying to become an agent for UWS.

In 2024, we have added this clause to our collaborative agreements for transnational education and with further education partners.

Key Performance Indicators

(since the introduction of the Modern Slavery Act 2015 unless otherwise stated)

- No concerns about modern slavery or human trafficking have been reported to the University directly;
- No concerns about modern slavery or human trafficking have been reported through the Report and Support Tool;
- 100% of the Procurement Team have received training on compliance with the Modern Slavery Act;

- 100% of UWS staff and contractors engaged directly by the University are paid at least the Living Wage, as set by Living Wage Scotland;
- 100% of contracts tendered through the University's Procurement Team were entered into using our standard Terms and Conditions in the financial year ending 31 July 2024.
- 100% of new suppliers tendered through the University's Procurement Team have signed up to the Sustain Supply Chain Code of Conduct in the financial year ending 2024 or the predecessor document (Modern Slavery Compliance Statement).
- Internal training delivered to three additional teams and training available to all staff.

This Statement was approved by the University Court on 25 November 2024 and signed below by the University's Principal and Vice-Chancellor.

Principal and Vice-Chancellor:

A handwritten signature in blue ink that reads "James A Miller". The signature is written in a cursive style with a large, sweeping initial 'J'.

Date: 29/11/2024