

APUC Modern Slavery and Human Trafficking Statement

Statement at End of 2017/18 Financial Year (ending 31/7/18)

Introduction

Purpose of the statement

This statement demonstrates APUC's commitment to the [Modern Slavery Act 2015](#) and specifically to section 54 (1). It aims to inform our member institutions, our staff and the general public about the steps APUC has taken during the last financial year, ending 31 July 2018, to identify and prevent modern slavery and human trafficking from taking place in any of its supply chains and in any part of its own business.

APUC's obligations under the Modern Slavery Act 2015.

APUC is the Centre of Procurement Expertise for Universities and Colleges in Scotland, providing institutional shared service procurement staff, collaborative framework agreements for the sector to use and guidance on best practise. APUC's own annual turnover falls below the required threshold of £36m for commercial organisations to publish a statement under the Act. However, APUC believes that given our client institutions' overall spend through its supply agreements and its vision to be a leader in driving forward the sustainable procurement agenda, that it has a responsibility to set out the steps it is taking to eradicate modern slavery from its supply chains.

APUC and Sustainable Procurement

Overview

APUC is committed to responsible procurement and to embedding this in all its procurement activity. Working with several member institutions, students and NGOs, we have set out a Sustainable Procurement Policy, Strategy and Code of Conduct. More details on APUC's Sustainable Procurement processes can be found [here](#).

Over 90% of APUC member institutions have adopted the APUC Sustainable Procurement Code of Conduct and refer to this in their procurement exercises. The Code has been used in APUC Framework Agreements since its inception in 2013 and has also now been adopted by a sister procurement consortia in England.

Commodity Areas

APUC's procurement activities are categorised into commodity areas, each led by a Head of Category. The categories are Laboratories, Information Services, Estates & Facilities and General Professional Services & HR.

APUC carries out an annual prioritisation exercise to determine high risk commodity areas. The top 5 have been determined as:

- Information Services (including IT)
- Waste
- Catering
- Janitorial
- Furniture

Risk Management

Each APUC category now has a 'Responsible Procurement Champion' (RPC) that leads the sustainability agenda for that category. The RPC leads the assessment of key risk suppliers through

the APUC Sustain process and to identify/manage potential modern slavery issues. Where necessary, further onsite audits are carried out on suppliers.

Training, Awareness & Involvement

APUC, together with the University of Strathclyde, ran a Serious Organised Crime awareness session for the sector, delivered by Police Scotland. This well attended event broadened the sector's understanding of modern slavery and human trafficking indicators and mitigating actions.

APUC again ran awareness training at the APUC conference in May 2018, particularly looking at the effect of labour abuses in the electronics supply chain.

APUC delivered training sessions on embedding sustainable procurement for its members in early 2018 as well as SUSTAIN assessor training for RPC's.

APUC is represented on the ETI Modern Slavery Working Group, looking at how public bodies and businesses are meeting the demands of the Modern Slavery Bill and sharing good practice. APUC has also fed into the Home Office consultation on its Modern Slavery tool.

APUC is part of a UK wide HE sector responsible procurement group run by HEPA, which considers, in part, sector approaches to modern slavery risk management.

APUC is a Founder Member of [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) and continues to be a full consortia member also (whereby all APUC members have full access to Electronics Watch benefits). APUC's Head of Development & Sustainability also sits on the board of Electronics Watch.

Sustainable Procurement Tools

Procurement tools that APUC provides for its staff and sector staff include a draft tender document, which includes full sustainable procurement references and a Modern Slavery Act compliance question, template strategy slides, the Code of Conduct, Prioritisation tool (based on the DEFRA Marrakech tool and the Scottish Government's own updated tools), SUSTAIN web portal and a variety of elearning (including on Human Trafficking and preparing a Modern Slavery Statement).

APUC Sustain: Supply chain sustainability web portal

To assess our suppliers' compliance with our Code of Conduct, APUC has developed a web-based assessment tool linked to the contracts database containing contracts/agreements used by the whole sector. The [website](#) assesses suppliers at three achievement/compliance levels in social, ethical, economic and environmental areas. All RPC's have been trained in full assessor use of Sustain to drive forward category risk management.

To date, over 70 suppliers have been provided with web logins for the assessment, 16 suppliers have completed the assessment, 4 have re-submitted following action on their improvement plan and numerous sub tier supplier disclosures have been received. APUC members have direct access to the website to manage their own supplier progress and improvement plans.

APUC has carried out an annual refresh of the country risk data it uses for the website also.

Actions for the next Financial Year

All APUC framework agreement 'prioritisations' will once again be refreshed and made available to its members.

The APUC embedding sustainable procurement training module will be converted to elearning and made available to the sector.

APUC will attend upcoming cross sector events including Eco Procura and the Electronics Watch conference to discuss pertinent issues including modern slavery.

SUSTAIN assessments will continue and increase in volume, with category RPC's and institutional dedicated resource now in place. The SUSTAIN assessment structure will be reviewed to ensure an efficient approach in line with partner priorities.

Angus Warren, CEO

This statement has been approved by the APUC Board who will review and update it annually.