

## APUC Modern Slavery and Human Trafficking Statement

Statement at End of 2019/20 Financial Year (ending 31/7/20)

### 1. 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 member institutions, staff and the general public about APUC’s policy with respect to Modern Slavery, and the actions taken to identify and prevent such practises from taking place in any of its supply chains and in any part of its own business.

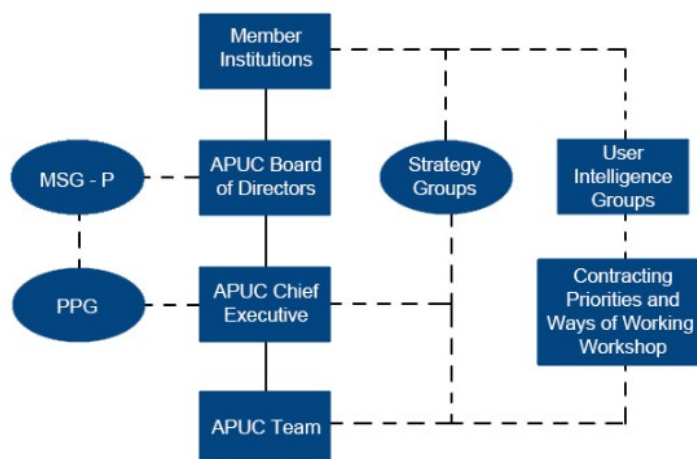
#### APUC’s obligations under the Modern Slavery Act 2015.

APUC is the Centre of Procurement Expertise for Universities and Colleges in Scotland, owned by the 44 Universities and College in Scotland. 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.

### 2. APUC and Sustainable Procurement

#### Structure, business and procurement categories

APUC is governed by a Board of Directors, made up of both HE/FE sectoral and non-sectoral representatives. In the wider context, APUC is also represented on pan public sector Scottish Government groups, as well as rest of UK (rUK) higher and further education groups.



APUC leads collaborative tendering activity on behalf of its members, establishing a range of framework agreements across a variety of category areas. APUC also has a significant number of ‘Institutional Shared Service staff’ – APUC Procurement / Supply Chain Managers that work directly within an institution.

Procurement activity within APUC is split into 4 main category areas:



Within each category there is an appointed **Responsible Procurement Champion**. The **Head of Responsible Procurement** provides support across these categories, as well as strategically and operationally for APUC and its members. This is a new role created in March 2020. Prior to this and a re-structure, these responsibilities were split across the Responsible Procurement Manager and a Development & Sustainability team.

Each category has undertaken analysis of the commodity areas and supply chains to assess potential risks of modern slavery and create a register of high-risk areas.

IS	Estates & Facilities	General Professional Services & HR	Laboratories
<ul style="list-style-type: none"> <li>•IT hardware including servers, desktops and laptops.</li> <li>•AV equipment and peripherals.</li> <li>•Some stationery items.</li> </ul>	<ul style="list-style-type: none"> <li>•Fresh and prepared food products.</li> <li>•Cleaning services.</li> <li>•Waste services.</li> <li>•Security services</li> </ul>	<ul style="list-style-type: none"> <li>•Temporary staffing</li> </ul>	<ul style="list-style-type: none"> <li>•Laboratory consumables.</li> <li>•Chemicals.</li> <li>•Electronic components within larger pieces of equipment (e.g. robotics or microscopes)</li> </ul>

APUC is actively involved in several cross-sector initiatives related to addressing modern slavery risks in supply chains. These include the HEPA (Higher Education Procurement Academy) Responsible Procurement Group, the Make ICT Fair project and the Procura+ group ‘Socially Responsible Public Procurement of ICT’.

APUC continues to support Electronics Watch (a collaborative monitoring organisation addressing labour rights issues in ICT supply chains), of which it was a founder member and also the first full consortia member (ensuring all its 42 members have full membership of Electronics Watch). APUC remains a pivotal member of Electronica Watch.

**Policies in relation to modern slavery and human trafficking**

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](#).

Virtually all of APUC member institutions have adopted the APUC Supply 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 been adopted by a procurement consortia and large HEIs in England. In accordance with its review cycle, the Code has been updated in early 2020 and adopted in March 2020, including a change of name to “Sustain Supply Chain Code of Conduct”.

A Responsible Procurement Action Plan has been developed for the 4 main collaborative category areas identified earlier. This includes a specific target on addressing modern slavery risk:

Area	Overall Goal	Target
1.3 Modern slavery	Commit Suppliers to provide Modern Slavery Statements and risk analysis	Address Modern Slavery with all Suppliers and understand their commitment to proactively work against it.

Bidder compliance with the requirements of the Modern Slavery Act is included within all APUC collaborative tenders.

### Risk Assessment, prevention and mitigation

Each Category Responsible Procurement Champion ensures commodity level risk assessment for modern slavery is carried out. The Responsible Procurement Manager supports at each tender process to embed sufficient measures to mitigate and address such risks.

*“At tender stage we ask contractors to demonstrate the methods employed to ensure its compliance with the Modern Slavery Act 2015 and demonstrate how the transparency of its supply chain will be maintained for the duration of the framework agreement. Tender questioning specifically asks whether there are any controls to their recruiting system, whether recruitment agencies, labour brokers or any other intermediaries have any involvement in supplying labour on their behalf, and also how risks associated with Modern Slavery are identified and mitigated by the contractor.”*

Example from Estates category tendering.

Where applicable, particularly within temporary staffing framework agreements and some Estates category framework agreements, checks are carried out that contractors hold a Gangmaster License.

Within the Laboratories category, first and second tier supply chains have been disclosed for Gloves supply chains. Work is under way to establish, and address, any associated risks in those supply chains, working in collaboration with partner organisations also using these suppliers.

Within the IS category, APUC has been able to collate its member IT hardware data and share with Electronics Watch to enable targeted worker monitoring. Within APUC awarded IT framework agreements, the Electronics Watch aligned terms and conditions have been embedded. APUC and its members also have access to several other key IT framework agreements awarded by UK HE procurement consortia, the Scottish Government and Crown Commercial Services. APUC work with all these partner organisations to try and ensure the appropriate monitoring conditions are included.

APUC has partnered with Electronics Watch and Globalworks on the Social@Risk project – which looks to analyse social media posts by workers in electronics supply chains to trigger further investigations. This innovative project is already providing transparency and outcomes that merit addressing by some brands and their supply chains.

APUC has been conducting an assessment of its contractors’ compliance with the APUC Supply Chain Code of Conduct for the past few years (using the ‘Sustain’ tool). This has been 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 contract managers

(within the sector, using the APUC toolset) that have a contractual relationship with that supplier. Actions may drive a further site visit in order to clarify certain points or investigate further.

The Sustain tool has been merged with the Equiano tool used by the consortia LUPC (London University Purchasing Consortia) to develop SCM – Sustain. This has further questions around Contractors' modern slavery statements as well as the original (updated) Sustain question set. This has been embedded into a new Supply Chain Management (SCM) tool. The SCM tool was launched by APUC for its members in August 2019 and enables modern slavery risk assessment to be fully integrated with supplier management processes. Phase 1 is now live for Contractors to complete which focuses on modern slavery act compliance. The Sustain tool 'phase 2' is in its final review stages and suppliers will be engaged to participate in August 2020.

### **Training, Awareness & Involvement**

APUC delivers, and its staff attends, training with a diverse variety of organisations in order to broaden awareness and skills, whilst gathering and sharing knowledge.

A Serious Organised Crime (SOC) awareness session was run for the sector, delivered by Police Scotland, in conjunction with University of Strathclyde and APUC. This well attended event broadened the sector's understanding of modern slavery and human trafficking indicators and mitigating actions. Police Scotland provided documents for SOC and Human Trafficking and these will be embedded into all ITT's where relevant and appropriate.

APUC offers an eLearning module for all its members on 'Modern Slavery and Human Trafficking', and on 'Writing a Modern Slavery Statement'.

The APUC Head of Responsible Procurement and other APUC staff, attended the Electronics Watch Conference in late 2019. The Head of Responsible Procurement alongside the CEO also were invited to and attended an event run by the OECD in March 2020, "Leveraging Responsible Business Conduct through public procurement - Unleashing the potential of public procurement to achieve positive impacts". The event brought together policy makers, public procurement practitioners and other key stakeholders to share perspectives, discuss challenges and learn from emerging good practices in relation to environmental criteria, human rights and labour rights. A workshop on "The importance of Modern Slavery Statement in Higher Education" at the 2019 COUP event has been attended by several APUC staff. Due to COVID –19 attendance of further training opportunities had to be postponed although these are now moving on line.

### **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 section, template strategy slides, the Supply Chain Code of Conduct, Prioritisation tool (based on the DEFRA Marrakech tool and the Scottish Government's own updated tools), SCM (Supply Chain Management portal) and the Sustain tool, and a variety of eLearning (including on Human Trafficking and preparing a Modern Slavery Statement).

### **3. Actions for the next Financial / Academic Year**

- ✓ APUC has launched its SCM portal, including 'phase 1' where APUC Contractors are to complete their modern slavery act compliance information. The launch of 'phase 2' in form of the Sustain tool will commence in August 2020.

- ✓ APUC will continue to ensure its team have comprehensive awareness of issues related to modern slavery and support awareness maximisation across its member institutions and its suppliers' supply chains.
- ✓ APUC will re-assess all its framework agreements and contractors (including all new framework agreements let since last assessment) in order to re-prioritise those which should be taken forward in the first wave of the Sustain assessments.
- ✓ Progress against Responsible Procurement Action Plan targets will be monitored.
- ✓ The reviewed Sustain Supply Chain Code of Conduct has already been adopted by partner procurement consortia in England and is further acknowledged by the UK Higher and Further Education Sector. We will promote its use in updated form across the sector helping suppliers to understand the importance of compliance with ethical standards. APUC will attend upcoming cross sector events including Procura+ and the 20/21 Electronics Watch conference to share good practice and discuss pertinent issues around modern slavery.
- ✓ Embedding SOC and Human Trafficking documents provided by Police Scotland into all ITT's where relevant and appropriate.

Angus Warren, CEO

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