

Modern Slavery and Human Trafficking Statement

1. Introduction

- 1.1 Glasgow Caledonian University (the University) is a higher education establishment that employs approximately 1400 staff members, teaches in the region of 13,500 students and purchases around £36.6m per annum of goods, services and works through various supply chain arrangements. The University is a registered charity: No:SC021474
- 1.2 The University has a zero tolerance policy in relation to modern slavery and human trafficking. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure the University is not contributing to modern slavery in any way. In accordance with Section 54 part 6 of the Modern Slavery Act 2015 this statement sets out the steps the University has taken in the financial year 2015-16 to ensure that it is not contributing to modern slavery through its business dealings and relationships.
- 1.4 This statement has been approved by the University Court who will review and update it annually.

2. Supply Chain

Our supply chains fall under the following main categories:

- Professional Services
- ICT Equipment and Services
- Estates and Facilities Management Goods and Services
- Library Resources
- Audio Visual equipment
- Laboratory Equipment

3. Due Diligence Processes

To date the University has taken the following measures to identify, assess and mitigate potential risk areas in its supply chain:

- GCU is committed to carrying out procurement activities in an environmentally, socially, ethically and economically responsible manner and to entering into agreements and contracts with suppliers that share and adhere to its vision. We have adopted a Supply Chain Code of Conduct which requires our suppliers to state that they do not use forced, involuntary or underage labour, that they do provide suitable working conditions and terms and treat employees fairly. To demonstrate this commitment, all current and potential suppliers are asked to acknowledge their compliance with the principles of the Supply Chain Code of Conduct, with respect to their organisation and their supply chain.
- Our Invitation to Tender template includes sustainable procurement statements which require contractors to ensure they comply with current legislation in relation to the Equality Act 2010, Minimum Wage Regulations, Working Time Regulations, Health & Safety at Work Act and Modern Slavery Act.
- We utilise a number of tools which allows us to undertake supply chain analysis in terms of modern slavery, for example Scottish Government Sustainable Procurement Prioritisation Tool, Global Slavery Index.

4. Training

Procurement staff members attended a Modern Slavery Act training course run in conjunction with the University of Greenwich and APUC (Advanced Procurement for Universities and Colleges) to increase awareness of the requirements of the Modern Slavery Act.

The requirements of the Modern Slavery Act are also addressed at the induction for procurement staff.

5. Actions for the next Financial Year

The Procurement Strategy is currently being redrafted which, in line with Procurement Reform (Scotland) Act 2014, will be published by December 2016. We are currently reviewing the Procurement manual which will eventually be replaced with a Sustainable Procurement Policy. Sustainable Procurement considers the environmental, social, legislative and economic consequences for design, materials used, manufacturing methods, logistics and disposal. We as a University understand that we have an important role to play in sourcing in a manner which looks to remove the use of modern slavery practices. The Sustainable Procurement policy will set out how we intend to further address these issues throughout the supply chain.

As Glasgow Caledonian University is an APUC institution, we directly benefit from work that APUC has undertaken.

- APUC has a web tool, 'Sustain' which assesses supplier compliance against the Supply Chain Code of Conduct including Social compliance, Ethical and Economic compliance and Environmental compliance. GCU Procurement is aiming to become more proactive in identifying suppliers and encouraging them to sign up to Sustain, to support delivery of a transparent, environmentally positive, ethical and socially responsible supply chain.
- APUC have recently undertaken the prioritisation exercise on the 137 collaborative framework agreements which they lead on, to identify areas where Modern Slavery may be occurring. GCU Procurement heavily promotes the use of these framework agreements within the institution and as such we can be confident that our supply chain has been analysed when contracting under these agreements. Going forward we will be looking to increase the uptake in these collaborative frameworks which will in reinforce the compliance with our policies.

Where possible, within our own tenders/contracts we will address areas of concern for modern slavery direct in the tendering process through minimum standards, specification and contract management).

GCU also intends to adopt the Scottish Government Sustainability test as part of their approach to Category Strategies. The tool enables a buyer to assess the risks and opportunities across various areas (including labour concerns) for a commodity or category. The University will also aim to apply this to all its contracts and categories (where not already done so by APUC).

Over the next financial year, GCU will increase its understanding of sustainability risks associated with each category and will work with APUC to facilitate embedding their category guides within the Institution.

GCU Procurement will be participating in any further Sustainable Procurement training developed by APUC, as well as continuing to attend any relevant training offered by other third parties.