

1. Organisation structure and supply chains

Glasgow Caledonian University (the University) is a higher education establishment that employs approximately 1,640 staff members, teaches in the region of 22,500 students and purchases around £48m per annum of goods, services and works. The University is a registered charity: No: SC021474.

In accordance with Section 54 of the Modern Slavery Act 2015 this statement sets out the steps the University has taken and will take to ensure that it is not contributing to modern slavery through its business dealings and relationships.

The University's 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

2. Policies in relation to slavery and human trafficking

The University has a zero tolerance in relation to modern slavery and human trafficking and the protection of Human Rights. 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. We have in publication a number of policy statements supporting our commitment:

- [Equality and Diversity](#)
- [Gift Acceptance Policy](#)
- [Public Interest Disclosure Policy](#)
- [Ethical Code of Conduct](#)
- [Procurement Strategy](#)

The University's commitment to workplace rights for employees of the University are outlined in [Staff policies](#). The Public Interest Disclosure Policy is designed to encourage employees to report any concerns which they may have about serious wrongdoing in the University in a responsible and appropriate manner.

The University has a Procurement Ethical Code of Conduct that includes an Ethics statement. Procurement have also implemented the Sustain Supply Chain Code of conduct which focuses on

suppliers responsibilities in social, ethical, economic, and environmental areas across the supply chain.

The Procurement Strategy sets out the strategic institutional approach to procurement and outlines the commitment to obtaining value for money in all transactions, and in conducting its daily business staff must consider the institution's wider responsibilities in terms of legal, moral, social, economic and environmental impact.

3. Due diligence processes

The University continues to take 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 enter into agreements and contracts with suppliers that share and adhere to its vision. The Sustain Supply Chain Code of Conduct requires our suppliers to state that they do not use forced, involuntary or underage labour, that they treat employees fairly and provide employees with suitable working terms and conditions. To demonstrate this commitment, all current and potential suppliers are asked to acknowledge their compliance with the principles of the Sustain Supply Chain Code of Conduct, with respect to their organisation and their supply chain.
- The University's 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. In addition, for regulated procurements, we require bidders to complete the Single Procurement Document (Scotland) as part of the tender process. In completing this, bidders declare that they have not committed any offence under Part 1 of the Human Trafficking and Exploitation (Scotland) Act 2015 or under any provision referred to in the Schedule of that Act.
- The University utilises a number of tools, which enables supply chain analysis in terms of modern slavery, for example the Scottish Government Sustainable Procurement Prioritisation Tool and the Global Slavery Index.

4. Risk assessment and management

As Glasgow Caledonian University is a member of Advanced Procurement for Universities and Colleges (APUC), the procurement centre of expertise for the higher and further education sector in Scotland, we directly benefit from work that APUC has undertaken.

APUC has a supply chain management tool, 'SCM' which assesses supplier compliance against the Sustain Supply Chain Code of Conduct including Social compliance, Ethical and Economic compliance and Environmental compliance. There are also questions around Contractors' modern slavery statements.

APUC has undertaken analysis of the category / commodity areas on all collaborative framework agreements which they lead on, to identify areas where Modern Slavery may be occurring and to take appropriate action to ensure that these framework agreements exclude the use of modern slavery practices. GCU Procurement continues to promote 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. GCU will look to increase reliance on these collaborative frameworks which will reinforce the compliance with policy.

As a member of APUC, GCU has engaged EcoVadis, an independent sustainability ratings agency, to assess supply chain sustainability practices within the HE/FE Sector. This includes commitment to fair and ethical trade, minimising environmental impact and promoting equality, diversity, and inclusion.

EcoVadis provides a globally recognised sustainability rating based on a standardised questionnaire, which considers industry sector, countries of operations, and company size. The sustainability scorecard ratings can help suppliers to reduce risk, drive performance and improve your environmental and social outcomes.

All strategic and recurrent suppliers will be invited to be rated, and the EcoVadis Scorecards results will be integrated into GCU supplier management processes.

APUC became the first full consortium member of Electronics Watch, whereby GCU, as an APUC member, has full access to Electronics Watch benefits. Electronics Watch is an independent monitoring organisation working to achieve respect for labour rights in the global electronics industry through socially responsible purchasing in Europe. GCU continues to work with APUC to monitor our supply chains.

GCU will continue to use the Prioritisation Tool and apply this to all contracts and categories (where APUC has not already done so). The tool enables a buyer to assess the risks and opportunities across various areas (including labour concerns) for a commodity or category. GCU will further increase its understanding of sustainability risks associated with each category. GCU Category Leads will continue to work with APUC Category Managers to facilitate embedding APUC responsible supply chain guides into future tendering activities within the Institution.

5. Key performance indicators to measure effectiveness of steps being taken

The University will continue to address areas of concern for modern slavery direct in the tendering process through minimum standards, specification and contract management.

The University let 48 new contracts, with 40 suppliers, who have committed to the Sustain Supply Chain Code of Conduct.

The University assesses the legislation applicable to each contract and takes steps to ensure bidders comply with it e.g. Health and Safety Legislation.

The University is a Living Wage Employer and where relevant and proportionate, the Living Wage and Fair Work Practices are promoted in tender documentation.

During the academic year GCU have let 24 new contracts, with 16 suppliers, who are accredited Living Wage employers.

6. Training on modern slavery and trafficking

Procurement staff will continue to participate in training and awareness sessions on sustainable procurement which includes Modern Slavery in the supply chain.

Procurement has a Responsible Procurement Champion to co-ordinate and promote responsible procurement, including adherence to the Modern Slavery Act.

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

7. Assessment

The University participates in the Procurement & Commercial Improvement Programme (PCIP) which independently assesses the Procurement processes of the University. It provides valuable benchmarks by which necessary improvements might be identified, consulted over and implemented.

The University's most recent PCIP assessment was conducted in November 2023, and the next assessment will be 2026. The assessment demonstrated the University's strengthened activities with a score of 86% (previously 72%).



Professor Stephen Decent
Principal and Vice-Chancellor

Statement approved by University Court 18 September 2025