Modern Slavery Act 2015: Slavery and human trafficking statement

Modern Slavery Act 2015 (the “2015 Act”) requires organisations who meet certain criteria to publish an annual statement outlining the steps taken by the organisation to ensure slavery and human trafficking is not taking place within the organisation or in any of its supply chains.

The University of Dundee is an institution of higher education. Our core purpose is the transformation of lives by working locally and globally through the creation, sharing and application of knowledge.

We are committed to the principles of the 2015 Act and to ensuring that there is no modern slavery or human trafficking in our organisation or in our supply chains.

When entering into business contracts, we do so in accordance with our policies to ensure that our business relationships are conducted in an environmentally, socially and economically sustainable manner.

To identify and mitigate risks, we carry out due diligence on new suppliers. As a part of our procurement process we ask the bidders and new suppliers to accept the Sustain Supply Chain Code of Conduct and, if the contract value exceeds £50,000, also require bidders to complete a Single Procurement Document which contains specific disclosure requirements in relation to slavery and human trafficking. Using these documents allows us to ensure that our suppliers acknowledge and comply with our values.

We intend to take the following steps to mitigate any risks in our existing supply chains:

- identify supply chains which we consider most “at risk” in terms of slavery and human trafficking; and
- work with our suppliers to investigate these supply chains to ensure that no issues are present and that preventative measures are in place.

We are as an institution seeking to identify better and practicable processes in our procurement and business operations which will make a real difference in helping combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the 2015 Act and constitutes University of Dundee’s slavery and human trafficking statement.

For and on behalf of the University of Dundee

October 2022
Approved by University Court 15 November 2022
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2022 Update

Modern Slavery Act 2015 (the “2015 Act”) requires organisations who meet certain criteria to publish an annual statement outlining the steps taken by the organisation to ensure slavery and human trafficking is not taking place within the organisation or in any of its supply chains. S54(4) of the 2015 Act, states that an annual statement is:

(a) a statement of the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place—
(i) in any of its supply chains, and
(ii) in any part of its own business”.

Completed Activity

Progress on planned activity from the 2021 Modern Slavery Statement was limited due to several staff changes within the Procurement Team and a focus on Procurement activities related to the Climate Emergency. However, the Head and Deputy Head of Procurement attended a presentation by Electronics Watch in August 2022 which was organised by APUC. Electronics Watch coordinate independent monitoring and remediation to help public sector organisations protect the rights of workers in their electronics supply chains. Their main activity involves identifying and remediating breaches of labour rights, safety standards and other issues related to workers rights by undertaking in-depth monitoring of companies throughout the electronics supply chain.

Efforts to ensure contracted suppliers to the University adhere to the Sustain Supply Chain Code of Conduct continued with all suppliers to new contracts in excess of £50,000 undertaken by the Procurement Team being asked to sign-up to the code as part of the tendering process. This activity is in addition to all new suppliers to the University being required to abide by the code of conduct as part of the University’s New Supplier process. Since go-live in 2019, c2,000 external organisations have been added to the 1U system with all suppliers agreeing to abide by the Sustain Supply Chain Code of Conduct.

Future Activity

Category Managers will be required to complete the HEPA ‘A Guide to Modern Slavery’ and the CIPS ‘Ethical Procurement and Supply’ e-learning modules as part of their 2022/23 objectives.

Category Managers plan to undertake analysis of ‘at risk’ supply chains as part of their Category Analysis and Plan development. One or more of these Category supply chains will be prioritised and evaluated in detail to ensure procedures exist at all levels of the supply chain to mitigate the risk of modern slavery-related activities being in place.

Where appropriate, we will supplement our own efforts with activities already being progressed by APUC. See the APUC Modern Slavery and Human Trafficking Statement and Electronics Watch for reference.

For further information visit www.dundee.ac.uk/procurement
or email procurement@dundee.ac.uk