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 2023
Approved by University Court 21 November 2023
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2023 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 2022 Modern Slavery Statement was limited due to the availability of staff within the Procurement Team and an increase in spend across the Labs and IT categories. However, the Procurement Team commenced and completed a project to support the University’s application to become a Living Wage employer. This involved an evaluation of existing contracts to establish whether University of Dundee contractors were paying the Living Wage. Whilst not directly related to Modern Slavery, organisations that pay the Living Wage often have wider policies and procedures in place relating to:

- Worker’s rights and behaviours – including the freedom of association to join a trade union or similar organisation, provide a workplace free from discrimination, bullying and harassment and treating all workers with dignity and respect.
- Ethical Compliance – including anti-bribery and corruption and fair-trade policies as well as undertaking analysis of their respective supply chains.

Organisations that have similar policies and procedures in place are far less likely to engage in activities relating to Modern Slavery. Therefore, the work undertaken by Procurement to implement the Real Living Wage across the University’s contracted suppliers provides indirect support to the University’s commitment to ensure slavery and human trafficking is not taking place within the organisation or in any of its supply chains.

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 2023/24 objectives.

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.