

University of Dundee

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 to accept the [APUC Supply Chain Code of Conduct](#) and, if the contract value exceeds £50,000, also require bidders to complete a European 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:

- identifying supply chains which we consider most “at risk” in terms of slavery and human trafficking; and
- working 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

November 2017

Approved by University Court 11 December 2017

University of Dundee

Modern Slavery Act 2015: Slavery and human trafficking statement – 2017 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”.*

In order to meet the requirements of point (i) above, an ‘at risk’ supply chain was identified through research undertaken by members of staff within the University’s Procurement team.

Following a Modern Slavery Training Course delivered by a representative from the Business, Human Rights and the Environment (BHRE) Research Group (based at the University of Greenwich School of Law), several ‘potentially at risk’ supply chains were identified (based on previous investigations conducted by a range of Non-Governmental Organisations). One such example was the seafood industry and whilst the University’s spend on seafood is minimal, it was deemed to be a good area to investigate as the majority of the University’s requirements for students and staff are provided through Campus Catering thereby adding an additional level to the supply chain.

‘At Risk’ Supply Chain Research Findings

The Facilities Management (FM) Category Manager within the Procurement team undertook research in conjunction with Campus Catering and established that the majority of seafood consumed by individuals in the University is ordered from Brakes Scotland through a framework agreement let by TUCO Ltd (The Universities Catering Organisation). The Grocery Provisions and Chilled Food Framework Agreement (Ref CAT11027 TU) was let on 5th Sep 2016 and is due to expire on 4th Sep 2018.

Supply Chain Level 1 – Campus Catering use of TUCO Ltd Framework Agreement

Whilst technically not part of the supply chain themselves, TUCO Ltd have requested copies of Modern Slavery Statements from all relevant suppliers and requested acknowledgement of the MSA 2015 Legislation from SME’s. TUCO Ltd also provide suppliers with access to a free, online tool that helps them create a Sustainability Action Plan for their business. The NETPositive supplier development tool (<https://supplierengagementthe.net-positive.org/>) is designed to support and develop the supply chain as part of an ongoing commitment to embedding sustainability in the procurement process. A key feature of the tool is the inclusion of content specifically addressing the requirements of the Modern Slavery Act 2015.

Supply Chain Level 2 – Brakes Scotland

As a supplier to TUCO Ltd, Brakes Scotland have policies designed to eliminate Modern Slavery within both their organisation and their own supply chain. These include adherence of organisations which are part of their supply chain to an ethical trading policy based on the standards within the Ethical Trading Initiative (ETI) which reflects key elements of the International Labour Organisation (ILO)

conventions. Further research established that Brakes in turn use M&J Seafood Ltd for their seafood requirements.

Supply Chain Level 3 - M&J Seafood Ltd

As a supplier to Brakes Scotland, M&J Seafood Ltd operate an ethical trading policy which includes a commitment to ethical and humane working practices. The policy states that if M&J Seafood Ltd become aware of any labour rights concerns with one of their suppliers, then they will investigate the issue and, if required, agree an action plan to address the issue with the supplier or delist the supplier from their supply chain (depending on the severity of concerns).

Conclusion

Having initially identified the purchase of seafood as an at risk commodity regarding modern slavery practices, the research carried out by Procurement has found that compliant policies exist throughout three levels of the supply chain. Assuming these policies transfer through to practices, then the University has some comfort regarding its purchase of seafood not being at risk of modern slavery practices further up the supply chain. Should the University become aware of evidence contradicting the practices throughout the supply chain, then action will be taken through the first tier supplier.

Future Activity

We are cognisant of the fact that there remain several 'potentially at risk' supply chains of products and services used by the University as well as the possibility that other supply chains previously thought to be compliant may be identified at a future date as being 'at risk'. A risk-based approach will be employed by Procurement to identify one or more of these supply chains per annum on which to conduct further investigations. Over time, this approach will provide the University with greater assurance that organisations in any 'potentially at risk' supply chains we are part of have the relevant policies and procedures in place to reduce the risk of modern slavery-related activities being in place.