



# Modern Slavery & Human Trafficking Statement

## Introduction

Founded in 1495, the University of Aberdeen is Scotland's third oldest university and the fifth oldest in the UK. The principle of serving the public good is enshrined in the University's founding purpose, to 'be open to all and dedicated to the pursuit of truth in the service of others' and its strategic vision [Aberdeen 2040](#). In keeping with this principle, the University takes a zero-tolerance approach in relation to modern slavery and human trafficking in all its forms.

Today, the University employs over 3,400 staff and teaches over 15,000 students from countries around the world. In line with our Sustainability and Social Responsibility Policy, which aims to set best practice standards meeting or surpassing the requirements of legislation, this statement reflects our commitment to act ethically, transparently and with integrity in all our business dealings and relationships, to implement the UN Guiding Principles on Business and Human Rights, and to establish and maintain effective systems and controls which ensure the University is not contributing to modern slavery in any way. For greater impact and socially responsible transformation, in line with the University's strategic vision 2040, it is committed to meeting the UN Sustainable Development Goals (SDGs). Aiming to draw attention to the SDGs and aligning academic institutions with the work of the UN Global Compact, the [University of Aberdeen Business School is a signatory to the UN Principles for Responsible Management Education \(PRME\)](#).

## Purpose of the Statement

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps the University has taken and will take to identify and prevent such practices from taking place in any of its supply chain and in any part of its own business.

## University Employees

The University Human Resources Policies set out our commitment to workplace rights at the University. The risk of modern slavery occurring in the University's workforce is mitigated by ensuring that staff are recruited following robust recruitment policies. We are rigorous in checking that all new recruits on our home campuses have the right to work in the UK. We also employ all staff and workers (temporary services/casual staff) on standard terms and conditions of employment.

The University adheres to the Public Interest Disclosure Act 1998 and implements its own Whistleblowing Policy regarding concerns about potential corruption, fraud, or other malpractices within the University.

The University is an accredited Living Wage (Scotland) Employer who has been certified by the [Living Wage Foundation](#) and implemented the Accredited Living Wage rate.

A due diligence approach is taken with service providers who regularly work onsite at the University to pay the Living Wage and, through our Contract Management process, continue to review this with them.

## Supply Chains

The University of Aberdeen procures a wide range of goods, services and works. Our supply chains fall under the following main categories:

- Laboratory Supplies (equipment, chemicals, pharmaceuticals etc.)
- Estates, Buildings and Facilities Management
- Computer Supplies and Services (including Audio Visual equipment)
- Professional Services
- Utilities

We have a published [University Procurement Strategy and Action Plan](#) which details our principles and practices and outlines how we take steps to ensure an ethical procurement approach.

The University is a member of Advanced Procurement for Universities and Colleges Ltd (APUC), the procurement centre of expertise for Scotland's universities and colleges. We contributed to and adopted the [APUC Code of Conduct](#) as the University's Code of Conduct ensuring consistency in approach to the Supply Chain throughout the Sector. In asking relevant suppliers to adopt the Supply Chain Code of Conduct we collaborate with others to demonstrate a commitment not to use forced, involuntary or underage labour.

Through the APUC SUSTAIN web-tool and database, suppliers are asked to provide details of measures they take in relation to modern slavery in their supply chain, including any third-party accreditations and assessments to evidence this. Where risks have been identified, we work with APUC or contact suppliers directly to deal with any social responsibility issues. The SUSTAIN tool has been further developed by APUC and incorporated into the SCM (Supply Chain Management) – Sustain tool.

Also, each regulated procurement process conducted by the University requires tenderers to disclose whether the bidder or any member of their organisation with decision making powers has been convicted in the last five years of any offence under [Part 1 of the Human Trafficking and Exploitation \(Scotland\) Act 2015](#), or under any provision referred to in the Schedule to that Act. Tenderers that confirm such a conviction will be excluded from the process unless they can successfully demonstrate that they have taken sufficient measures to demonstrate compliance with this Act.

The University of Aberdeen is a [founding member](#) of [Electronics Watch \(EW\)](#) and continues to support the organisation. EW is an organisation set up to drive improvements in labour conditions of IT supply chains and provides a structure compliant with legislation to investigate, monitor, and address labour issues in IT products supplied to public sector organisations. Members benefit from the collective push to improve labour standards.

The University utilises APUC IT Framework Agreements and EW aligned terms and conditions have been embedded within those. The University IT hardware data shared with APUC is used to identify high risk areas and enable targeted worker monitoring.

We have a significant programme of transnational education projects which includes both a remote campus and various articulation agreements with partners based in countries that may have different labour standards and practices and different legal recourse for victims of exploitation. In accordance with our recently updated transnational project approval and governance procedures, we have no appetite at all for an initiative that conflicts in any way with this Statement. We will conduct proactive human rights due diligence from the inception of all such projects and will require our overseas partners to assess and address their own modern slavery risks, sharing their findings and actions with us.

### **Steps Taken During Last Financial Year**

Members of the Procurement Team attended a Higher Education Procurement Association (HEPA) workshop on International Procurement (including working conditions and human rights) and completed e-learning suite on Protecting Human Rights in the Supply Chain produced by the HEPA national Responsible Procurement Group. Also attended APUC webinar on Social Issues in Procurement which included Human Trafficking and Exploitation.

In line with the University's Procurement Policy & Procedures, suppliers continue to be sent the [University of Aberdeen Supply Chain Code of Conduct](#) and companies must confirm they adhere to the Code of Conduct, in order to enforce and promote sound social, ethical, environmental and economic practises.

The University of Aberdeen Procurement worked with APUC Responsible Procurement Group to research suitable tools/service to review suppliers' sustainability credentials/Corporate Social Responsibility (CSR) performance and manage detailed supply chain assessments. The EcoVadis portal has now been selected on behalf of the Scottish HE/FE Sector to provide this service and the University has signed up as an early adopter. The Procurement Team received initial training on the use of the EcoVadis portal & database and will start the process in coming months.

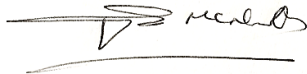
In overseas building projects in particular, where we have an interest, we will insist on rigorous standards of human and worker rights and have mechanisms in place to support this. Existing governance structures have been enhanced further to oversee the University's interest in the construction by its Qatari partner of the second phase of its Qatar operation. A new Human Rights and Equalities subgroup of the Partnership Management Group has been set up to advise the Management Group and the Strategic Board and to oversee and scrutinise the development of the Phase 2 project and subsequent build, completion and opening of the new premises from the perspective of assurance of an appropriate standard of human rights, consistent with this Statement. The Subgroup has recently appointed an external, independent specialist to offer advice, recommendations and training in this regard.

### **Next Steps**

The Procurement Team will analyse where the greatest likelihood of slavery is within the organisation's operations and its supply chain. Using this, along with spend analysis (indicates where we may have most influence) to prioritise high risk categories/suppliers. We will work with EcoVadis to assess those suppliers across a range of CSR issues, which are grouped into four themes - Environment, Labour & Human Rights, Ethics and Sustainable Procurement. EcoVadis' CSR experts will produce ratings and detailed scorecards that make it easy for the University and the Supplier to understand their CSR performance, and to work together where improvements are needed. The

EcoVadis rating is based on an evidence-based assessment, adapted to hundreds of business categories, considers relevant industry labels and certifications as well as local laws in 150 countries, and is aligned with global standards such as the UN Global Compact.

In the course of the next year, the University will consider further how to raise awareness of what modern slavery means in the University context, will look at how we train and upskill staff and students and how research in this area can enhance our understanding and therefore our practices. This consideration will include options for a forum where issues relating to modern slavery from across the range of University activities can be discussed and actions agreed

A handwritten signature in black ink, appearing to read 'mead', is written over a horizontal line. The signature is stylized and cursive.

Director of Finance  
6 January 2022