



Modern Slavery Act 2015

Modern Slavery and Human Trafficking Statement

1. Introduction

The Modern Slavery Act 2015 (the Act), recognises slavery, servitude, forced or compulsory labour, and human trafficking as a crime and a violation of fundamental human rights.

SRUC recognises its responsibilities and commitments under the Act, and in compliance with the provisions of Section 54, makes the following statement regarding the steps it has taken during 2023, and will continue to take in the future, to ensure that no modern slavery or human trafficking is taking place in any part of the organisation or its associated supply chains. This statement summarises the actions and activities carried out by SRUC in order to better understand the potential risks of modern slavery and human trafficking and the systems and controls that have been introduced to mitigate, and where possible, eliminate those risks.

2. About SRUC

SRUC is a private company limited by guarantee, registered in Scotland (Registered Number: SC103046) and has charitable status (Charity Number: SC003712). The SRUC Board of Directors is responsible for the management and regulation of the financial affairs of the organisation, ensuring compliance with the Financial Memorandum and associated guidance of the Scottish Further and Higher Education Funding Council (SFC).

The primary charitable purposes of SRUC are transacted through the above company, with commercial trading activities being conducted through a wholly owned subsidiary, SAC Commercial Limited.

SRUC delivers innovative and progressive research and education, business support and consultancy services for Scotland's rural industries, and associated food and drink sector.

Our Vision

To be Scotland's enterprise university at the heart of our sustainable natural economy.

Our Mission

Creating and mobilising knowledge and talent. Partnering locally and globally to benefit Scotland's natural economy.



Our Values

Respect - we will recognise that everyone in the organisation makes a contribution to our success.

Innovate - we don't wait for things to happen, we constructively challenge how things are done.

Support - we look beyond the boundary of our own roles to support others and share knowledge.

Excel - we take pride in contribution, we have high standards of excellence and always work to our core values.

3. Our Statement

SRUC is committed to ensuring that modern slavery and human trafficking is not taking place in any part of its operational activities or within its supply chains. We are committed to protecting and respecting human rights across SRUC's activities, and will take where reasonable, appropriate and possible, steps to influence others to ensure slavery and human trafficking does not take place.

Our suite of Human Resources Policies confirm our commitment to workplace rights for employees and we promote our Dignity At Work Policy and Equal Opportunities Policy to ensure an environment based on dignity and respect, that does not condone or allow bullying, harassment, discrimination or any other unacceptable behaviour. Additionally, our Anti-Corruption Policy and Whistleblowing Policy provide staff with the means to report improper conduct or unethical behaviour.

In compliance with the Procurement Reform (Scotland) Act 2014, SRUC's [Annual Procurement Strategy](#), along with our Procurement and Sustainability Policy, set out our principles and approach to ensuring ethical and sustainable procurement. This includes

- support of international and locally proclaimed human rights;
- procurement of fairly and ethically produced products and fair working practices;
- promotion of the Living Wage;
- promotion of equal opportunity to eliminate discrimination, harassment and victimisation or any other prohibited conduct under the Equality Act 2010.

4. Our Supply Chain Spend

SRUC has relevant expenditure of approximately £37m across Goods, Services and Works. Our supply chains support the College under the following six main categories:

- **Capital Works** (including building construction and renovation);
- **Estates, Buildings and Facilities Management** (including utilities, cleaning, catering, and waste);
- **Laboratories** (including consumables, chemicals and equipment);
- **Farms** (including livestock feed, fertiliser, agricultural chemicals, vehicles and equipment);
- **Information Systems** (including desktop and laptop computers, servers, printers, mobile phones, and audio-visual equipment);
- **Professional Services and HR** (including temporary staffing).

5. Our Procurement Activity and Due Diligence

As noted in SRUC's most recent [Annual Procurement Report](#), 95% of SRUC's goods and services are sourced from within Scotland and the rest of the UK. The risk of Modern Slavery in SRUC's activities is therefore considered to be of low risk.

However, it is fully recognised that potential risks may exist in relation to the global economy and its impact on some of the goods and services consumed by SRUC including electronic equipment, clothing, and PPE. In addition, the displacement of populations caused by both climate change and global conflict, and the associated link to increased human exploitation and trafficking, are also considered. For SRUC, such risks are reduced as we seek to further increase the proportion of goods and services sourced through collaborative contracts let by Advanced Procurement for Universities and Colleges ([APUC](#)), the Scottish Government, and other Public Sector centres of procurement excellence.

SRUC has adopted APUC's [Sustain Supply Chain Code of Conduct](#) for all regulated procurement processes, and when deemed appropriate below this threshold. The Code of Conduct requires all tenderers, as a contractual obligation, to commit along with SRUC to the principles of corporate social responsibility, sustainability and a pledge that each party shall:

- not use forced, involuntary or child labour;
- provide suitable working conditions and terms;
- treat employees fairly;
- ensure ethical compliance and support economic development;
- ensure environmental compliance.

The adoption of this Supply Chain Code of Conduct is mandated for all suppliers wishing to participate in a tender action led by SRUC's Procurement Team. In addition, consideration of the risk of Modern Slavery is included in all SRUC business cases requesting formal procurement action to be taken.

Where appropriate, SRUC will supplement its own efforts with activities already being progressed by APUC. See the [APUC Modern Slavery and Human Trafficking Statement](#) and [Electronics Watch](#) for reference.



Every regulated procurement process, and when deemed appropriate below this threshold, requires tenderers (and any sub-contractor or supply partner on which they rely) to complete the Single Procurement Document (Scotland) ([SPD](#)).

The SPD requires the tenderer to disclose details of its trading activity, and legal and environmental compliance. This includes disclosure of whether the tendering organisation or any individual with decision-making powers employed within the organisation has been convicted, within the previous 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 any such conviction will be excluded from the tender process unless it can be successfully demonstrate that sufficient and appropriate remedial action to demonstrate their reliability has been taken (self-cleansing).

6. Staff Training and Awareness

SRUC's Procurement function commits to undertaking all relevant training and awareness sessions to meet its Continuous Professional Development (CPD) requirements. As part of this, staff regularly attend seminars covering a variety of relevant topics including, but not limited to, ethical procurement and supply chain risk.

As part of their CPD for 2024 the Procurement Team will be required to complete [HEPA's](#) 'A Guide to Modern Slavery', [CIPS](#) 'Ethical Procurement and Supply', and APUC's 'Serious and Organised Crime' e-learning modules.

To raise awareness across the organisation, SRUC utilises an online training course that explains the risks of modern slavery and what steps should be taken if a staff member suspects exploitation is taking place. All staff are required to complete this course on a regular basis.

This Statement was approved by SRUC's Executive Leadership Team, January 2024

Prof. Wayne Powell, Principal and Chief Executive