



## **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 under the Act, and in compliance with the provisions of Section 54, makes the following statement regarding the steps it has taken during financial year 2021/22, 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 purpose activities of SRUC the charity are transacted through that company with the trading activities of the divisions transacted 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 contributions, 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 [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 a non-pay annual expenditure of approximately £25.6m across Goods, Services and Works. Our supply chains fall under the following main categories:



- Estates, Buildings and Facilities Management;
- Laboratory Equipment, Supplies and Services;
- Farms and Agricultural supplies;
- Electronic Supplies and Services including Computing, Telephony, and Audio-Visual Equipment;
- Utilities;
- Professional Services.

## 5. Our Procurement Activity and Due Diligence

The risk of Modern Slavery in SRUC'S activities conducted in Scotland and the rest of the UK is considered low. However, we recognise the potential risks linked to the extended and indirect supply chain of goods and services generated by the global economy. For SRUC, such risks are reduced as an ever-increasing proportion of these goods and services are sourced through collaborative contracts let by Advanced Procurement of 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, which requires all tenderers, as a contractual obligation, to commit to its principles. The Code of Conduct details SRUC's and tenderers' duties in corporate social responsibility and sustainable areas across each identifiable supply chain. This includes a pledge that each party shall:

- not used 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 awarded new contracts as a result of tender action led by SRUC's Procurement Team. In addition, consideration of the risk of Modern Slavery has been included in all business cases requesting formal procurement action to be taken.

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 tenderer 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 and appropriate remedial action to demonstrate their reliability (self-cleansed).



## **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 ethical procurement and supply chain risks. [HEPA's](#) 'A Guide to Modern Slavery' and the [CIPS](#) 'Ethical Procurement and Supply' e-learning modules have also been adopted as key training tools for the Team.

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. This course, which all staff are required to complete, was first rolled out in early March 2019. In line with SRUC's established approach to compliance training, the Modern Slavery module is subject to a regular review and update, and staff are required to refresh their understanding as part of SRUC's rolling commitment to compliance training.

**This Statement was approved by SRUC's Executive Leadership Team,  
January 2022**

**Prof. Wayne Powell, Principal and Chief Executive**