

APUC Modern Slavery and Human Trafficking Statement

Statement at End of 2025/26 Financial Year (ending 31/7/26)

1. Introduction

Purpose of the statement

This statement demonstrates APUC's commitment to the [Modern Slavery Act 2015](#) and specifically to section 54 (1). It aims to inform member institutions, staff and the general public about APUC's policy with respect to Modern Slavery, and the actions taken to identify and prevent such practises from taking place in any of its supply chains and in any part of its own business.

APUC's obligations under the Modern Slavery Act 2015.

APUC is the Centre of Procurement Expertise for and jointly owned by the Universities and Colleges in Scotland. APUC's own annual turnover falls below the required threshold of £36m for commercial organisations to publish a statement under the Act. However, APUC believes that given our client institutions' overall spend through its supply agreements and its vision to be a leader in driving forward the sustainable procurement agenda, that it has a responsibility to set out the steps it is taking to eradicate modern slavery from its supply chains.

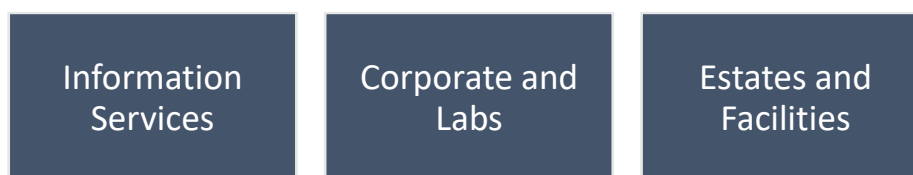
2. APUC and Sustainable Procurement

Structure, business and procurement categories

APUC is governed by a Board of Directors, made up of both HE/FE sectoral and non-sectoral representatives. In the wider context, APUC is also represented on pan public sector Scottish Government groups, rest of UK (rUK) higher and further education groups and wider international sustainable supply chain collaborations.

APUC leads collaborative tendering activity on behalf of its members, establishing a range of framework agreements across a variety of category areas through its Strategic Sourcing Team. APUC also has a significant number of shared service staff working in work directly within institutions through its Institutional Procurement Services Team.

Procurement activity within APUC is split into 3 portfolios:



The Responsible Procurement Team, consisting of the **Head of Responsible Procurement** and a **Responsible Procurement Manager** provide support across these categories, as well as strategically and operationally for APUC and its members.

Each portfolio has undertaken analysis of the category / commodity areas and their supply chains to assess potential risks of modern slavery and create a register of high-risk areas.

Information Services	Estates & Facilities	Corporate and Labs
•IT hardware including servers, desktops and laptops. •AV equipment and peripherals. •Some stationery items.	•Fresh and prepared food products. •Cleaning services. •Waste services. •Security services. •Protective Clothing and Garments	•Temporary staffing. •Laboratory consumables. •Chemicals.

APUC is actively involved in several cross-sector initiatives related to addressing modern slavery risks in supply chains. This includes the HEPA (Higher Education Procurement Academy) [responsible procurement group](#), the [UKUPC Responsible Procurement Network](#), the [International Working Group on Ethical Public Procurement \(IWGEPP\)](#) and [Electronics Watch](#).

APUC continues to support [Electronics Watch](#) (a collaborative organisation addressing labour rights issues in ICT supply chains), of which it was a founder member and also the first full consortia member (ensuring all its 40 members have full membership of Electronics Watch). Two APUC members of staff currently sit on the Electronics Watch Board of Trustees.

Policies in relation to modern slavery and human trafficking

APUC is committed to responsible procurement and to embedding this in all its procurement activity. Alongside the Responsible Procurement Policy and Strategy, APUC, in collaboration with several member institutions, students and NGOs, have set out a Sustain Supply Chain Code of Conduct. This has since been adopted as the UK HE sector's standard code of conduct. More details on APUC's Sustainable Procurement processes can be found [here](#).

Over 90% of APUC member institutions have adopted the Sustain Supply Chain Code of Conduct and refer to this in their procurement exercises. The Code has been used in APUC Framework Agreements since its inception in 2013 and has also been adopted by procurement consortia in England and Wales.

Bidder compliance with the requirements of the Modern Slavery Act is included within all APUC collaborative tenders.

Risk Assessment, prevention and mitigation

For each category, a commodity level risk assessment for modern slavery is carried out. The Responsible Procurement Team assists each tender process to embed sufficient measures to mitigate and address such risks. Where relevant, tenders will require suppliers to demonstrate what measures they will undertake in order to ensure that workers' rights are upheld and that slavery and human trafficking is not taking place in any of its supply chains nor in any part of its business.

"At tender stage we ask contractors to demonstrate the methods employed to ensure its compliance with the Modern Slavery Act 2015 and demonstrate how the transparency of its supply chain will be maintained for the duration of the framework agreement. Tender questioning specifically asks whether there are any controls to their recruiting system, whether recruitment agencies, labour brokers or any other intermediaries have any involvement in supplying labour on their behalf, and also how risks associated with Modern Slavery are identified and mitigated by the contractor."

Example from Estates category tendering.

Where applicable, particularly within temporary staffing framework agreements and some Estates category framework agreements, checks are carried out that contractors hold a Gangmaster License.

Within the Laboratories category, first and second tier supply chains have been disclosed for Gloves supply chains. Work is under way to establish, and address, any associated risks in those supply chains, working in collaboration with partner organisations also using these suppliers.

Within the IS category, APUC has been able to collate its member IT hardware data and share with Electronics Watch to enable targeted worker monitoring. Electronics Watches work provides specific information on procured models and any issues at their manufacturing site. Confidential Monitoring Status Reports provide detailed information on potential issues and how individual institutions can take action. Electronics Watch specific terms and conditions have been embedded into APUC awarded IT frameworks and other UKUPC consortia Framework Agreements which APUC members can access. APUC and its members also have access to several other key IT framework agreements awarded by HE procurement consortia, the Scottish Government and Crown Commercial Services. APUC work with all these partner organisations to try and ensure the appropriate monitoring conditions are included.

Police Scotland documents for SOC and Human Trafficking have been embedded into all ITT's where relevant and appropriate.

APUC has been using an updated Responsible Procurement Section 1 of its Supply Chain Management (SCM) tool to gather their contractors' commitment to ethical supply chain practices, including verification of legally required Modern slavery Statements in line with the Modern Slavery Act 2015, adherence to and use of a Supply Chain Code of Conduct, and measures to mitigate risks of human and labour rights abuses. It further enquires about Tier 1/2/3 Supply Chain Information and any remediation of ethical issues in the Contractor's supply chain.

A key facet in APUC's sustainability agenda is to ensure transparency around our supplier community and their sub suppliers' responsible business performance. APUC has chosen EcoVadis, a global CSR rating company based on international standards, to conduct individual sustainability performance assessments across all relevant areas of our supplier / supply chain community. Suppliers receive a sustainability scorecard from EcoVadis with detailed insights into their strengths along with opportunities for improvement. The roll out of the service to the collaborative team started in August 2021 and has further been made available to client institutions to use. EcoVadis also uses 360 Watch, an AI news tool, to update on news linked to suppliers, this includes labour and human rights breaches allowing for further investigation.

Training, Awareness & Involvement

APUC delivers, and its staff attends, training with a diverse variety of organisations in order to broaden awareness and skills, whilst gathering and sharing knowledge. APUC offers support, guidance and training regarding identifying and mitigating sustainability risks in public procurement, this encompasses Modern Slavery and Human Trafficking. APUC offers an eLearning module for all its members on 'Modern Slavery and Human Trafficking' and on 'Writing a Modern Slavery Statement'. An eLearning module has also been developed for staff and members around addressing Serious and Organised Crime in Public Procurement.

Sustainable Procurement Tools

Procurement tools that APUC provides for its staff and sector staff include a tender suite, which includes full sustainable procurement references and a Modern Slavery Act compliance question; template strategy slides; the Sustain Supply Chain Code of Conduct; Prioritisation tool (based on the Scottish Government's Sustainable Procurement tools); SCM (Supply Chain Management portal) and its Responsible Procurement Section 1; the UKUPC Responsible Procurement Commodity Mapping Tool, which is used to identify thematic areas which should be considered in procurement of the category in question; as well as a variety of eLearning (including on Human Trafficking and preparing a Modern Slavery Statement).

3. Actions for the next Financial Year

- ✓ APUC is successfully using the SCM portal and EcoVadis as described above. APUC will continue to require contractors to complete Section 1 and, where appropriate invite contractors to participate in a deep dive assessment via the third-party tool, EcoVadis.
- ✓ APUC will continue to assess all its framework agreements and contractors in order to re-prioritise those which are included in our due diligence tools, i.e. EcoVadis and SCM Section
- ✓ APUC will continue to promote the use of the Sustain Supply Chain Code of Conduct across the sector helping suppliers to understand the importance of compliance with ethical standards.
- ✓ APUC will engage with and promote partners such as Electronics Watch and attend relevant conferences to gain knowledge, share good practice and discuss pertinent issues around modern slavery and wider sustainability matters.
- ✓ APUC will work with partner organisations and groups to support public procurement practice that help prevent human rights violations.
- ✓ APUC will continue to provide informal and formal training on human rights and transparency in supply chains.
- ✓ APUC will consider and review the ethical use of Artificial Intelligence in business processes.”
- ✓ Regular, scheduled review of APUC procurement process to ensure compliance.

Angus Warren, CEO

This statement has been approved by the APUC Board who will review and update it annually.