



THE UNIVERSITY *of* EDINBURGH



Modern Slavery Statement

2021/22

For the period 1 August 2021 to 31 July 2022

The University of Edinburgh

Modern Slavery Statement 2021/22

At the University of Edinburgh, we are committed to protecting and respecting human rights and have a zero-tolerance approach to slavery and human trafficking in all its forms. This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and constitutes the University of Edinburgh's slavery and human trafficking statement for the financial year beginning 1 August 2021 and ending 31 July 2022. It sets out the steps the University has taken across our research, teaching and operational activities in relation to slavery and human trafficking in our supply chains and within our own organisation.

1. Our commitment

The University's [Strategy 2030](#) sets out our vision to make the world a better place. A key focus of the Strategy is Social and Civic Responsibility, ensuring that our actions and activities deliver positive change locally, regionally and globally.

We recognise that modern slavery is a significant global human rights issue that includes human trafficking, sexual exploitation, forced and bonded labour, domestic servitude and some forms of child labour. Our commitment starts from protecting and respecting human rights and taking action to prevent slavery and human trafficking in all its

forms. We are committed to acting ethically and with integrity in all our relationships, and using all reasonable endeavours to take action within our direct operations and wider sphere of influence to ensure that slavery and human trafficking are not taking place. We recognise we have a responsibility to raise awareness of modern slavery by researching, teaching and engaging staff and students on this issue.

2. The University's structure and activities

The University of Edinburgh is constituted by the Universities (Scotland) Acts 1858 to 1966. The Universities (Scotland) Acts make specific provision for three major bodies in the Governance of the University: Court, Senate and General Council. The University is organised into three colleges (College of Arts, Humanities & Social Sciences, College of Medicine & Veterinary Medicine and College of Science & Engineering), a Finance Directorate and three professional services Groups (Corporate Services Group, Information Services Group and University Secretary's Group). Over the 2021/22 academic year, the University comprised roughly 15,941 staff (11,256 Full Time Equivalent) and 49,065 students, with an annual turnover of £1,298m.

The University educates students from all over the world, and seeks to attract, develop, reward and retain the best staff for a world-class teaching and research institution. Many University of Edinburgh staff work internationally and some are based, or spend a significant amount of their time, working at University facilities overseas. These international facilities include liaison offices in Chile, China, India, Singapore and the USA, and collaborative ventures (teaching, research and outreach) in China and India. In 2021, the University restarted global travel following the Covid-19 pandemic, in line with government guidance. We also released a [Sustainable Travel Policy](#) which is designed to better support our travellers before, during, and after their trip by requesting the majority of travel bookings are undertaken with a single supplier.

We buy a wide range of goods and services, in accordance with public procurement law and our ethical sourcing policies. These include construction services and supplies, furniture and stationery, electronics (computers, audio visual equipment, phones etc.), food and catering supplies, travel services, laboratory supplies (small and large equipment, chemicals, consumables, pharmaceuticals etc.), books and printing and waste management services. A large proportion of our spend is through frameworks established by collaborative consortia, particularly the Advanced Procurement for Universities and Colleges (APUC) and The University Caterers Organisation (TUCO).

Our procurement spend over the 2021/22 financial year was £301.3 million, with thousands of unique suppliers. We awarded 145 regulated public procurement contracts during this period for a value of £123.3 million, with 80 of these won by SME contractors. £64 million of this spend came through collaborative contracts of which £31.4 million of spend was on **Category A** contracts (available to all public bodies e.g. Scottish Government, Crown Commercial Services) - accounting for 10.4% of total spend, and £32.5 million of spend was on **Category B** contracts (available to public bodies within a specific sector – e.g. APUC, Scotland Excel) - accounting for 10.8% of total spend.



3. Assessing modern slavery risks in our supply chains and other areas

We recognise there are risks of modern slavery in the supply chains for all types of goods and services. By its very nature, modern slavery is hard to detect and is often hidden within seemingly legitimate industries.

We conduct research and use the Scottish Government's [Sustainable Procurement Tools](#) to assess sustainability risks, including modern slavery, in prioritised procurement categories (currently travel services, electronics, food and catering, laboratory supplies and building supplies). [Briefing papers](#) and action plans summarising these category risks and opportunities have been produced.

These risk assessments inform our annual Procurement Category Strategies. Each Strategy contains a sustainability

section where upcoming high-priority procurements and risk mitigation actions are identified, including for modern slavery concerns. We aim to work collaboratively with other universities, procurement bodies such as the APUC, civil society organisations and government agencies to share information and mitigate risks.

Due to controls and systems the University has in place to manage recruitment and subcontracting, the risk of modern slavery on our campuses is considered low. Additionally, given the global reach of our University, we recognise that there are potential risks of modern slavery related to our international activities, especially when located in high-risk countries.

Supply chain risks

We have identified a number of potential risk areas related to our supply chains, highlighted by our research and media reports. In 2021-22 there were alerts to potential risk of modern slavery within Higher Education student recruitment - where individuals are being trafficked into the UK on student visas and then moved into situations which amount to modern slavery. Following the news article, the University has evaluated the risk of such instances occurring within our recruitment and admissions process.

While the severity of the risk is considered to be high, the likelihood of such a risk occurring at the University is considered to be low due to the safeguards in place during the application process, international check-in, and ongoing attendance and academic engagement monitoring required by the University to maintain its sponsorship licence with UK Visas and Immigration service (UKVI). The University is currently evaluating steps to further reduce the likelihood such instances occurring.

Other high risk areas include imported goods, including food such as fish and seafood from Asia, cocoa farmed in parts of West Africa, sugar cane grown in the Caribbean, rice produced in India and Myanmar, construction materials including stone from India and China, garments produced in South America and Asia, electronics manufactured in Asia and other laboratory equipment. In the UK, relevant sectors that have a higher risk of modern slavery include hospitality, cleaning services, construction sites, farms and food processing facilities.

The Covid-19 pandemic continues to increase the vulnerability of many groups to human trafficking and modern slavery; particularly women and migrant workers. The subsequent economic downturn, increased cost of living, travel restrictions and reduced scrutiny of working conditions has left many workers stranded without income or at risk of exploitation from employers.

4. Our policies and practices for the prevention and mitigation of human trafficking and modern slavery, including steps taken in 2020/21

People working on our campuses

Our [Human Resources Policies](#) set out workplace rights at the University. We are rigorous in checking that all new recruits have the right to work in the UK. Where it is necessary to hire agency workers or contractors, our staff are directed to specified, reliable agencies that have been vetted through the University's rigorous procurement procedures and meet our imposed selection criteria regarding their employment policies and practices. For example, agencies are asked to identify sub-contractors used and to promote fair work practices as appropriate. The University is accredited by the [Living Wage Foundation](#), which certifies that all staff are paid a real living wage. Non-University contracted workers that regularly work onsite at the University are expected to be paid the UK living wage as defined by the Living Wage Foundation, and the University evaluates suppliers' approach to Fair Work Practices, including the Living Wage, in line with statutory guidance.

The University adheres to [The Public Interest Disclosure Act 1998](#) and implements its own [Whistleblowing Code of Practice](#) regarding concerns about potential corruption, fraud and other unlawful practices within the University. If a case of modern slavery were to be suspected on site, this would be fully investigated in accordance with the [Anti-Slavery policy](#) (2021) and appropriate disciplinary action would be taken against any member of staff found to have acted in breach of any relevant University policies. No instances, or potential instances, of on-site modern slavery were raised in 2021-22.



Purchasing and supply chains

The University's [Procurement Strategy 2021-26](#) outlines our ethical procurement approach and sets out our principles and practices for the acquisition of goods, services and building works. Within this strategy, modern slavery is noted as one of the key sustainability areas for our contract clauses. We also produce annual Category Strategies to assist in managing specific issues and risks. Other relevant documents include our [Conflict Minerals Policy \(2016\)](#), [Palm Oil Policy \(2019\)](#), [Fair Trade Policy \(2004, updated in 2020\)](#) and guidance on addressing 'fair work' practices in procurements. As noted above, in 2021 we published an [Anti-Slavery Policy](#) to specify our commitments and responsibilities in this area.

We have integrated modern slavery into the University's terms and conditions for purchase contracts. Supplier are required to a) comply with the UK Modern Slavery Act 2015 and all other applicable laws regarding anti-slavery and human trafficking; b) maintain policies to ensure compliance; c) perform due diligence on their supply chains and include anti-slavery and human trafficking provisions in their supply contracts and; d) notify the University of any breaches and provide the University with annual compliance reports. Any breach of these obligations is specifically deemed a material breach of contract, which would entitle the University to terminate such contract with immediate effect where appropriate. If evidence were found indicating modern slavery in our supply chains, we recognise our responsibility to work with others to address this and reserve the right to terminate contracts where serious violations are discovered.

The requirement for suppliers to comply with the Modern Slavery Act as well as International Labour Organisation (ILO) fundamental conventions is included in our contract notices, European Single Procurement Document checks, and Invitation to Tender documentation, where relevant. These measures are also in place for non-regulated construction procurements. We have created template letters to request more information from suppliers about Modern Slavery Act and ILO compliance if we have concerns about the reliability of information provided in this regard.

The University has a [Purchase Order Policy](#) to ensure that staff only make purchases, other than small expenses, using established processes. This is being monitored by finance transaction teams. New suppliers to the University managed locally by different Schools and Departments are required to complete a self-declaration form to confirm they meet the requirements of the Modern Slavery Act, where applicable.

The University has adopted the updated [APUC Sustain Supply Chain Code of Conduct](#). The Code sets out social, environmental and ethical standards that suppliers are expected to comply with, including no use of forced, involuntary or underage labour. Relevant suppliers are asked to sign the Code of Conduct upon entering into a contract with the University.

Where risks have been identified in relation to existing contracts, we work with APUC or with suppliers directly, to raise questions about human rights issues. For example, within the Laboratories category, first and second tier supply chains had been disclosed for gloves supply chains of suppliers to the APUC framework agreement for laboratory plastic-ware, glassware and sundries. We used this information to establish and address associated risks in those supply chains.

The University implemented a new Sustainable Travel Policy which launched in January 2022. Within this policy, the majority of bookings for accommodation and transport are to be undertaken through a single travel management supplier. This process aims to better manage transport and accommodation bookings, and allow bookers to select accommodation options which have been audited for a range of potential risks, including modern slavery.

The University continues to maintain its longstanding commitment to fair trade and expand its approach to ethical supply chains. In 2017/18 we participated in the pilot of a new Fairtrade University and Colleges Award, led by the Fairtrade Foundation and SOS UK and received a "two-star" award in recognition of our whole institution approach to supporting fairness in trade. This award was due for reaccreditation in May 2021 but, due to the impact of Covid-19 on our operations, was deferred to 2022. We resubmitted for the Fairtrade Award in early 2022, with the University receiving a "two-star" award once again. Our cafes stock a range of fairly traded products including fairly traded rice, chocolate, coffee, sugar, bananas and tea, and a new, sustainability focused café – Bloom Natural Café – was opened on the Kings Building campus. The University shop also expanded its range of Global Organic Textile Standard (GOTS) and Fair Wear certified products. In 2021, we supported the student-led planetary menus project which introduced 18 set menus in our Pollock Hall catered accommodation. These set menus focused on weekly themes including waste reduction, Fairtrade and ethical eating with the aim of increasing awareness of, and support for, human rights in our food supply chains.

The intense upsurge in global demand for certain products like PPE and ICT has increased risks to human rights in supply chains during the Covid-19 pandemic, and the presence of virus itself has impacted worker safety across the globe. In 2021/22, the University continued to work internally and with its partners to address some of these risks, and acknowledge that, in some regions in which our supply chains operate, Covid-19 is still a major concern.

Electronics Watch

In 2014, the University became a founding member of [Electronics Watch](#), an organisation that works to monitor working conditions in factories producing Information and Communication Technology (ICT) goods bought by European public sector members. Electronics Watch aligned terms and conditions have been embedded within APUC-awarded IT framework agreements used by the University. Suppliers provide details of the factories in which the ICT equipment bought by the University are produced, and Electronics Watch works with civil society organisations in the countries where the factories are located to monitor working conditions. When issues are detected, APUC raises them with suppliers during contract management meetings.

This map shows examples of known modern slavery risk areas for our prioritised procurement categories, based on research and media reports.

Modern Slavery can happen anywhere, near and far, all the way through the supply chain.



Accommodation and hospitality



Farms and food processing facilities



Construction sites



Cleaning services



Electronics manufacturing and e-waste disposal



Cotton growing



Medical instruments manufacture



Rice



Sugar cane



Cocoa



Construction materials (e.g. stone)



Fishing



Conflict minerals



Garment manufacture

Prioritised procurement categories



Estates and construction



Laboratories



Travel



Food and catering



Information and
Communication Technology

Base map: PeterHermesFurian via Getty Images

Fundraising

The University accepts philanthropic donations and research funding from a wide range of sources. There is a risk that sources of potential funding could be linked to unethical or illegal activity, including exploitation (either directly to the prospective donor, or as an underlying source of funding for the donation). For example, funding could stem from profits from an organisation where modern slavery has occurred, or from an individual who has links to exploitative businesses.

Following a planned review of due diligence procedures, the University established an Income Due Diligence Group (IDDG). The purpose of this group is to ensure that all streams of funding whose source raises potential red flags in relation to a range of ethical issues, including modern slavery, are subject to enhanced scrutiny.

The University screens all potential donations in excess of £10,000 for a number of ethical and reputational issues, which includes any potential connection to modern slavery. Where due diligence checks indicate a significant issue or concern, the case will be passed to the Income Due Diligence Group for review. In 2021-22, IDDG search terms were updated to include additional terms such as 'abuse' and 'slave*' as these were considered more relevant terms to cover modern slavery and human rights violations. No modern slavery concerns were raised through the IDDG in 2021-22.

Investments

Our [Responsible Investment Policy Statement](#) summarises the approach of the University in relation to investments. As signatories of the [United Nations Principles of Responsible Investment](#), now known as PRI, we integrate environmental, social and governance (ESG) issues into investment and ownership decisions. All of our fund managers are PRI signatories and share a commitment to assess ESG concerns (including human rights issues such as modern slavery) in our investments.

Following direct engagement with fund managers on human rights and modern slavery in 2019, PRI are taking further action to support investors to play a role in pushing for more and better human rights due diligence and will focus in particular on efforts to tackle modern slavery and human trafficking. PRI carries out an assessment of our integration of the principles into our fund management. Due to a technical failure with the PRI reporting system, we are awaiting the results from our last assessment (2021). In our most recent rating (received in 2020), we received an A rating. The programme continues to be paused by PRI throughout 2022 while the technical failure is corrected, and is due to return in 2023.



Research, teaching and partnerships

The University provides various programmes and courses that specifically examine issues of modern slavery and human trafficking. A range of courses and research also examine historical slavery. Research related to human rights in supply chains and the impact of UK Modern Slavery Act is taking place across the University. A six-month AHRC grant was completed in 2021 by a lecturer in the School of Social and Political Science.¹ This research studied the impact of Covid-19 measures on modern slavery for Syrian refugees working in agriculture in the Middle East, and concluded that the ILO's definition of "forced labour" did not capture the Syrian experience of "unfreedom".

University of Edinburgh researchers continue to participate in the Consortium of Anti-Trafficking Research in Scotland (CATRIS). This collaborative partnership, created at the University of St. Andrews, brings together leading Scottish academics to identify opportunities for collaboration and address a perceived research-policy-practice gap in Scotland.

The Department for Social Responsibility and Sustainability takes a 'living labs' approach to problem solving, which means using our own academic and student research capabilities to explore or resolve issues related to University practice. In addition, the Students as Change Agents programme (SACHA) is a co-curricular student opportunity to work on global challenges based on the SDG's. In 2021, three SACHA groups focused on the question: "How can Scotland move beyond awareness raising and have the Fair Trade concept instilled in public consciousness and buying practices?"

As in previous years, the University's Department for Social Responsibility and Sustainability hosted a student from the School of Law's LLM in Human Rights for a work-based placement over the 2022 summer. The placement provided recommendations for improving the University's reporting on modern slavery, based on a best practice review within the sector and externally, and bolstered partnerships with global institutions who are leading on this topic.

Our research contracts reflect the University's modern slavery approach. Research funders and collaborating partners are required to confirm equivalence with the University's ethical commitments. All staff in the Edinburgh Research Office (ERO) have been briefed on modern slavery risks and the Modern Slavery Awareness course is part of the list of Research Integrity trainings for University researchers. Awareness of modern slavery risks has also been incorporated into Ethical Research Partnerships guidance for staff and students working with organisations and institutions overseas. The Academic Collaboration Agreement Templates used by our Edinburgh Global Department and Edinburgh Research Office require partners to comply with all applicable laws and regulation relating to anti-slavery and human trafficking, and not to engage in any activity, practice or conduct which would constitute an offence under the Modern Slavery Act.

Annual [Research Ethics and Integrity Reports](#) provide a snapshot of the work being carried out across the University to put our institutional commitment to strengthening the integrity of our research into practice.

1 Zuntz et al. (2022). "Syrians' only option – Rethinking unfree labour through the study of displaced agricultural workers in the Middle East." *Journal of Modern Slavery* 7(2): 10-32.



5. Training and capacity building

As a place of learning, we recognise our responsibility to raise awareness of the issue of modern slavery, and to train some groups specifically on modern slavery risks and best practices. We incorporated modern slavery awareness into our 2022 Fairtrade Fortnight campaign, with a [student blog post](#) highlighting child labour in supply chains, and posted about modern slavery issues at other points throughout the year. In February 2022, we also invited representatives from Tony's Chocolonely on to campus to discuss the risk of modern slavery within the chocolate industry, and highlight their mission to make 100% slave free chocolate the norm.

We have continued to promote our Modern Slavery Awareness online training course to staff and students. The course aims to raise awareness about what modern slavery is and how to prevent it. This course is mandatory for all staff members with authority to approve financial transactions.

Procurement staff are also required to complete annual ethics training which includes human rights due diligence, as part of their Chartered Institute of Purchasing and Supply affiliation. In addition, we continue to link to publicly available modern slavery resources and online courses [on our website](#).

We are active members of the Higher Education Procurement Authority's Responsible Procurement Group (RPG), and the RPG's Human Rights Subgroup, where we aim to share our experiences of managing modern slavery risks and collaborate with others in the sector.



6. Key Performance Indicators

We have devised Key Performance Indicators to measure our progress on modern slavery:

Key performance indicator	2021/22 measure
# of contracts that are issued on University standard terms and conditions that include modern slavery compliance provisions	All purchase contracts now include modern slavery requirements.
# suppliers engaged with directly on modern slavery (email, phone, or face to face)	All suppliers engaged indirectly through new terms and conditions and self-declaration requirement.
# suppliers providing information on modern slavery efforts on Ecovadis supplier database	97 published reports, 28 in progress, 14 declined in total (across the sector)
# known reported modern slavery cases in our direct areas of influence	0
# reported cases resolved	-
# staff trained on modern slavery risks and best practice (online or face to face courses) Target = 1,000	63 staff have taken in-house online training on modern slavery in 2021-22 (to date, up to July 2022). Dedicated training for Edinburgh Research Office completed November 2021. All MCIPs professionals in the Procurement Office complete Ethical Procurement Training every year to maintain their membership. Five students have completed online training in 2021-22 (to date, up to July 2022).
Reaching staff, students and the wider community: # event attendees and online page views related to modern slavery	11,467 (August 1 2021- 31 July 2022)
Collaborations with others	We have collaborated with Electronics Watch, APUC, Environmental Association for Universities and Colleges (EAUC), National Union of Students (NUS), Higher Education Procurement Association (HEPA), and the Scottish Government.

7. Action plan for next financial year

In 2022-23, in addition to continuing the work outlined above, we will focus in particular on the following:

- Undertaking a light touch review of our approval processes after six years of implementing the act
- Assess the implications of any amendments to the 2015 Act, through the Modern Slavery (amendment) Bill 2021
- Establish a strategic value partnership with University of Sydney, with a view of sharing knowledge and best practice across the Modern Slavery theme
- Improve understanding of breadth of modern slavery instances within HE, and ensuring colleagues at key departments are aware of these potential instances.
- Raise awareness of the University's Anti-Slavery Policy (2021) amongst staff and students
- Act on relevant recommendations put forward by LLM student placement to SRS and modern slavery working group
- Continue to integrate modern slavery due diligence as part of our contract management activities.
- Continue to raise awareness of modern slavery amongst staff and students
- Develop further research collaborations related to modern slavery risks and solutions.
- Continue to undertake research and benchmarking activities to inform our approach

8. Approval and review

Date statement approved

12 September 2022

Final approval by

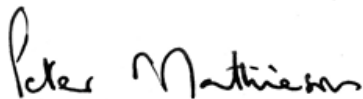
University Executive

Consultations held

In addition to the Working Group members detailed above, the statement has been reviewed by the University Executive and the Principals Office.

Dates for review of statement

December 2023



For and on behalf the University of Edinburgh

Further information and contact


University approach to modern slavery:

www.ed.ac.uk/sustainability/programmes-and-projects/supply-chains-and-investments/modern-slavery

Contact: SRS.Department@ed.ac.uk

Please contact us if this statement is required in an alternative format.

You can view this statement online at
www.sustainability.ed.ac.uk
and it can be made available in alternative
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