



Anti-Slavery Policy

1. Purpose

The purpose of this document is to set out our commitments and responsibilities in relation to modern slavery.

2. Policy

- The University is committed to the highest standards of professional practice and good governance.
- 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.
- We are committed to protecting and respecting human rights and have a zero-tolerance approach to 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.
- The University is also committed to taking steps to ensure there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015. We publish an annual Modern Slavery Statement describing the steps we took over the previous year in relation to slavery and human trafficking
- We will put controls and systems in place to reduce the risk of modern slavery taking place in our business or supply chains. We expect our suppliers, contractors and partners to do the same. Our Terms and Conditions of Purchase require that our suppliers comply with the Modern Slavery Act 2015 and all other Applicable Laws regarding anti-slavery and human trafficking, to require the same of their direct suppliers and subcontractors, and to conduct due diligence on their supply chain.

3. Scope

- This policy applies to all persons working for the University or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, students, agents, contractors, external consultants, third-party representatives and business partners. This includes University of Edinburgh subsidiary companies.

4. Responsibilities

University Court approves the annual Modern Slavery Statement and has delegated responsibility for the implementation of this policy as follows:

- The Director of Procurement, is responsible for enacting and overseeing modern slavery controls and due diligence processes related to University suppliers and supply chains.
- The Directors of Human Resources, Edinburgh Global, Edinburgh Research Office and Development and Alumni have responsibility for implementing effective modern slavery safeguards within recruitment, global partnerships, research and fundraising activities, respectively
- Procurement Officers and lead researchers have a responsibility to communicate this policy to suppliers, contractors and research partners at the outset of our business relationship with them.
- Management at all levels are responsible for ensuring those reporting to them are made aware of this policy and attend relevant training on it and the issue of modern slavery in supply chains.
- The Department for Social Responsibility is responsible for updating this policy and the annual statement and supporting the identification and management of guidance.
- All persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners are responsible for reading, understanding and upholding the Policy and our zero-tolerance approach to modern slavery.

5. Compliance with this policy

- You must ensure that you read, understand and comply with this policy You are required to avoid any activity which would knowingly lead to a breach of this policy.
- Any employee who breaches this policy will face disciplinary action, which could result in sanctions up to and including dismissal for gross misconduct
- We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.
- Anyone with concerns regarding a suspected case of modern slavery or violation of this policy within any part of the University or its supply chains is encouraged to raise it. If you are unsure if any situation or treatment of workers constitutes a form of modern slavery then do not hesitate to raise it. If you believe or suspect a breach of this policy has occurred or that it may occur you must notify the Director of Procurement as soon as possible. A link to the re referral form is here and included as Annex 1.
- This mechanism is open to all, including staff, students, partners and the public.
- We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

6. Communicating

- This policy will be communicated internally and externally.
- This policy will be communicated to suppliers, contractors and research partners at the outset of our business relationship with them.
- Where it is considered appropriate and necessary, contracts will include an obligation for suppliers to share this with employees involved in delivering the contract and provide proof. It is the responsibility of the Procurement Officer or lead researcher responsible for the relationship to do this.

7. Approval and Review

Reviewers	Department for Social Responsibility & Sustainability, Director of Procurement, Legal, Modern Slavery Working Group Members, Social Responsibility and Sustainability Committee and final review by Finance.
Final approval by	University Executive
Consultations held	Modern Slavery Working Group Sustainability, Social & Civic Responsibility Committee
Date of commencement of policy	14 September 2021
Dates for review of policy	2026
How policy will be reviewed	Every 5 years via SRS Committee.
Policies superseded by this policy	NA
Version	1

University of Edinburgh

Referral of Potential Conflict or Breach of Modern Slavery

This referral form should be completed to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at any level of supply at the earliest possible stage. This referral form should be used to notify the Director of Procurement as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future.

Completed forms should be emailed to: finance.helpline@ed.ac.uk

Contact details for the person making the referral	
Name:	
Email:	
Detail below areas of concern*:	

*please include as much information as possible so that this can be effectively followed through, you may therefore be contacted to clarify/obtain further information if deemed necessary.