



# Modern Slavery Statement - 2016/17

## 1. Introduction

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 sets out the steps the University has taken and will take in relation to slavery and human trafficking.

## 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 in three Colleges (College of Arts, Humanities & Social Sciences, College of Medicine & Veterinary Medicine and College of Science & Engineering) and three Support Groups (Corporate Services Group, Information Services Group and University Secretary's Group).

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 significant proportions of their time, working at University of Edinburgh facilities overseas. These international facilities include liaison offices in Chile, China, India, Singapore and the USA; and collaborative ventures (teaching, research, outreach) in China and India. As a truly global university, rooted in Scotland's capital city, we make a significant, sustainable and socially responsible contribution to the world.

## 3. Our commitment

We recognise that modern slavery is a significant global human rights issue and includes human trafficking (for domestic or sex work and other forms of labour), forced and bonded labour, some forms of child labour, and domestic servitude. Our commitment starts from protecting and respecting human rights and taking action to prevent slavery and human trafficking in all its forms. We will act ethically and with integrity in all our relationships, and use all reasonable endeavours to take action directly and within our sphere of influence to ensure slavery and human trafficking is not taking place. We are committed to continuing to carry out research and offer teaching on modern slavery.

## 4. Modern slavery risks in our supply chains and other areas

We buy a wide range of goods and services, in accordance with public procurement law and our ethical sourcing principles and practices. These include construction services and supplies, furniture and stationery, electronics (computers, audio visual, etc.), food and catering supplies, travel services, laboratory supplies (equipment, chemicals, pharmaceuticals etc.), books and printing, and waste and

recycling services. A large proportion is bought through frameworks established by collaborative consortia.

Due to controls and systems that the University has in place, the risk of modern slavery on our campuses is low. However, we recognise that there are risks linked to global supply chains related to the goods and services that we procure and that modern slavery is usually hidden. In addition, given the global reach of our University, we recognise that there are potential risks of modern slavery occurring related to our international activities, especially when located in high risk countries.

We work with others, including universities, procurement bodies such as Advanced Procurement for Universities and Colleges, civil society organisations, and government agencies, to share information and mitigate risks.

## 5. Our policies and practices

### People working on our campuses

Our [Human Resources Policies](#) set out our commitment to 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 met the imposed selection criteria regarding their business and employment policies and practices. For example, agencies are asked to identify any sub-contractors and to promote 'fair work' practices, as appropriate.

Our [Dignity and Respect Policy](#) promotes an enabling and inclusive environment in which all members of the University community are treated with dignity and respect, and bullying, harassment and discrimination are known to be unacceptable. We are committed to fair, progressive and ethical working practices and have signed the [Scottish Business Pledge](#). The University adheres to The Public Interest Disclosure Act 1998 and implements its own Whistleblowing Policy regarding concerns about potential corruption, fraud or other unlawful practices within the University. If any modern slavery cases were to be suspected on site, any alleged violation of human rights would be fully investigated and appropriate disciplinary action would be taken against any member of staff found to have acted unethically and in breach of the University's commitment to human rights.

### Our supply chains

We have published [University Procurement Strategy](#) which displays our principles and practices in the acquisitions of goods, services and building works, and outlines how we take steps to ensure an ethical procurement approach. We have contributed to and adopted the Advanced Procurement for Universities and Colleges (APUC) [Supply Chain Sustainability Policy](#) which promotes the Ten Principles of the UN Global Compact. In asking relevant suppliers to adopt the [APUC Supply Chain Code of Conduct](#) we collaborate with others to demonstrate a commitment not to use forced, involuntary or underage labour. Other related policies include our [Conflict Minerals Policy \(2016\)](#), our [Fair Trade Policy](#) (2004, updated 2013), and our statutory duty to consider 'fair work' practices appropriately, supporting social responsibility locally and globally.

To identify and assess potential risk areas in our supply chains, the University uses tools developed with and provided by the Procurement Directorate in the Scottish Government such as the Sustainable Public Procurement Prioritisation Tool (SPPPT) and Life Cycle Mapping approach (based on United Nations precedents), to assess prioritised categories (travel, electronics, food and catering, laboratory supplies, building supplies). [Briefing papers](#) summarising the category risks and opportunities have been produced and action plans made. Modern slavery is highlighted as a risk throughout, and appropriate questions to ask bidders or suppliers during the procurement process are recommended. The process leads to action points for different groups in the University, including procurement actions, research questions and operational changes to consider. As the first organisation to fully make use of these tools, we share our learning with others, and have invested resources to further develop the tools. Through the APUC Sustain database, suppliers are asked to provide details of measures they take in relation to modern slavery in their supply chain, including any third-party accreditations and assessments to evidence this.

Where risks have been identified, we work with APUC or other consortia, or directly, to raise social responsibility questions including human rights issues at contract management meetings with our key suppliers, assess publicly available reports from companies, and follow-up on any concerns we identify.

In 2014, the University became a founding member of Electronics Watch, an organisation that works to ensure good working conditions in factories producing Information and Communication Technology (ICT) goods bought by public sector members across Europe. We provide details of the factories in which the ICT equipment we buy are produced, according to our suppliers, and Electronics Watch works with civil society organisations in the countries where the factories are located to monitor working conditions. In 2017, all members of APUC became members of Electronics Watch through the consortium membership, recognising the need to work together to achieve greater impact, and the University remains an active member.

If evidence were found indicating modern slavery in our supply chains, we recognise our responsibility to work with others to address this. The University, in certain cases, will have the right to terminate contracts where serious violations are discovered.

## Fundraising and investments

We work to screen philanthropic donations to ensure they do not come from unethical sources. All proposed donations of £5,000 or more are subject to due diligence by Development and Alumni, including searching for any connection to modern slavery. The extent of due diligence and of oversight applied will increase in line with an assessment of the risk associated with the potential donor and potential size of the donation. Donations of more than £500,000 will be subject to a full due diligence review and risk assessment by Development and Alumni, and are automatically referred to the University's Ethical Fundraising Advisory Group.

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.

## 6. Specific steps we have taken in 2016/17 to identify and mitigate modern slavery risks

### Procurement contracts and supplier engagement

We have drafted specific terms to be inserted in the University's purchase contracts which will require suppliers 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 such supply contracts; d) notify the University of any breaches and provide the University with annual compliance reports. We are aiming to include these terms in the University's standard Terms and Conditions of Purchase by the end of 2017.

We have contacted 133 suppliers to ask about their modern slavery efforts and the related issue of conflict minerals, and have begun to assess where we can best help suppliers improve their approaches. We are supporting further work to develop and implement the Sustain supplier database for the Scottish Further and Higher Education sector, to increase the number of suppliers completing the questionnaire and providing evidence of their efforts and progress.

### Supply chains research and risk assessment

We conducted research into our own food and construction suppliers' approaches to modern slavery, and the extent of their compliance with the Act. Forty-six suppliers were assessed, based on the information they had made publicly available. The research report has been used internally to identify suppliers to engage further with regarding modern slavery.

We have continued to use the Sustainable Procurement Prioritisation Tool to identify risks and prioritise actions regarding our construction supply chains in particular.

### Awareness and training

As a community of over 13,000 staff and 39,000 students and a place of learning, we recognise our responsibility to raise awareness on this important issue, and to train some groups of staff specifically on modern slavery risks and best practice.

In 2016/17, we held an event on human rights abuses in supply chains, including a focus on modern slavery, during Fairtrade Fortnight. We also incorporated modern slavery awareness into our Fairtrade Fortnight social media campaign. We presented our approach to modern slavery and conflict minerals at a Sustainable Procurement Topic Support Network event, attended by procurement staff from other universities and colleges. One student volunteer worked with the University discuss modern slavery with relevant student societies and the Students Association. We published a briefing paper on our approach to conflict minerals.

We added content about modern slavery into an online sustainability training course (Be Sustainable), available to all staff and students. We have prepared content on social responsibility

and sustainability issues and policies, including modern slavery, to be added to our training for staff who purchase equipment, stationery and other items for their teams, which will be rolled out in the coming academic year. Seventeen Procurement Office staff have received training on modern slavery risks and how to take appropriate action. Budget holders and/or approvers of financial transactions are asked to confirm their awareness and understanding of the Modern Slavery Statement (and other key commercial policies) through the Finance Department's online portal. Our Director of Procurement has participated in two Scottish Government consultation events on the Human Trafficking and Exploitation (Scotland) Act (2015) and its implementation and monitoring strategy.

## Teaching and academic research

The University has continued to provide various programmes and courses that specifically examine issues of modern slavery and human trafficking. In the Law School, these include the MSc in Global Crime, Justice and Security, the LLM in Human Rights, and a postgraduate course on Transnational Organised Crime and the Law. In the School of Social and Political Science, these include undergraduate and postgraduate courses on Anthropology of Displacement and Migration, and a postgraduate course on Gender and Sexuality in Global Politics. In the Business School, a Global Challenges course is taken by all first-year undergraduates. Extensive research related to human rights including in supply chains is taking place within the Global Justice Academy and Global Development Academy. A wide range of courses and research also examine historical slavery.

A seminar was organised by the Tumbling Lassie group, made up of The Faculty of Advocates, as well as other lawyers and justice advocates, including University academics and PhD students, to discuss the future of laws pertaining to slavery and human trafficking, while reflecting on slavery of the past.

We collaborated with Electronics Watch and other partners across Europe on a bid for European funding for a three-year project looking at working conditions in ICT supply chains, and collaboratively secured circa 3-million-euro funding. The project involves research and awareness raising – of the general public and also specifically public procurers across Europe.

A group of MSc African Studies students assessed and discussed the University's own Conflict Minerals Policy and associated issues as part of their course.

## Overseas employment practices and international partnerships

While our HR team in Edinburgh does closely collaborate on recruitment of staff for our international offices, we have begun to explore what more can be done to mitigate any risks regarding other people working in the University's sphere of influence internationally, such as those contracted for cleaning or janitorial services, transport or interpreters. Awareness of modern slavery risks is being incorporated into new Ethical Research Partnerships guidance for staff and students working with other organisations and institutions overseas.

## Working together

Our Modern Slavery working group has included representatives from the Department for Social Responsibility and Sustainability, Procurement Office, Human Resources Department, Edinburgh Global, Edinburgh University Students Association, School of Law, School of Social and Political Science, students, Legal Services, Communications and Marketing, Waste, Research Support Office

and Court Services. We have met three times this year, to discuss our progress on modern slavery, share relevant information, and agree on next steps. This has engaged a wide range of staff in the issue of modern slavery, and has raised awareness of potential risks and best practices within different departments.

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

Key Performance Indicator	2016/17 measure
<b>% of contracts that are issued on University standard terms and conditions that include modern slavery compliance provisions</b>	To be integrated during coming year
<b># suppliers engaged with directly on modern slavery (email, phone, or face to face)</b>	133
<b># suppliers providing information on modern slavery efforts on Sustain supplier database</b>	23
<b># known reported modern slavery cases in our area of influence</b>	0
<b># reported cases acted on</b>	-
<b># staff trained on modern slavery risks and best practice (online or face to face courses)</b>	17
<b># staff, students and wider community reached by our awareness-raising activities on modern slavery (online content and campaigns, events...)</b>	10,000+
<b>Collaborations with others</b>	We have collaborated with Electronics Watch, APUC, EAUC, NUS, HEPA, and the Scottish Government.

## Next steps

In 2017/18, in addition to continuing the work outlined above, we will focus in particular on the following:

- Providing training on modern slavery risks for relevant groups of staff, including internationally
- Embedding modern slavery requirements in University standard Terms and Conditions relating to the Purchase of Goods and Services
- Embedding modern slavery requirements in Terms and Conditions in Edinburgh Global partnerships development template, guidance and Memoranda of Understanding
- Supplier engagement, including through the Sustain database and face to face events
- Continue to integrate wider ethical considerations in relation to sources of research funding
- Develop and implement our position in relation to palm oil and links to human rights and modern slavery
- Continue to raise awareness of modern slavery, including producing a video on social responsibility and sustainability in supply chains
- Developing further research collaborations related to modern slavery.
- Review Modern Slavery due diligence in relation to our commitments to responsible investment

## 7. Approval and review

Date statement approved	4 December 2017
Final approval by	University Court
Consultations held	In addition to the Working Group members detailed above, the statement has been reviewed by the Social Responsibility and Sustainability Committee, Central Management Group and Audit & Risk Committee
Dates for review of statement	December 2018



Principal

For and on behalf the University of Edinburgh

Date: 21/12/17

## 8. Further information and contact

University approach to modern slavery: <http://www.ed.ac.uk/about/sustainability/modern-slavery>

Contact: [SRS.Department@ed.ac.uk](mailto:SRS.Department@ed.ac.uk)

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