



THE UNIVERSITY *of* EDINBURGH



Modern Slavery Statement

2020/21

For the period 1 August 2020 to 31 July 2021

The University of Edinburgh

Modern Slavery Statement 2020/21

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 2020 and ending 31 July 2021. 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 2020/21 academic year, the University comprised roughly 15,000 staff and 45,000 students, with an annual turnover of £1,187 million.

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. Throughout the 2020/21 academic year, like others around the world, we paused most of our travel and many staff and students switched to working and studying remotely or in a hybrid way (blending remote and in-person).

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 proportion of our spend is through frameworks established by collaborative consortia, particularly Advanced Procurement for Universities and Colleges (APUC) and The University Caterers Organisation (TUCO).

Our procurement spend over the 2020/21 financial year was approximately £266 million, with thousands of unique suppliers. We awarded 138 regulated public procurement contracts during this period for a value of approximately £72 million, with 76 of these won by small/medium contractors and 90 by micro/small/medium contractors. Twenty-four million of this spend came through collaborative contracts (66% with APUC, and 34% with other), and we spent £55K with supported businesses.



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 tools (including the Scottish Government's Sustainable Procurement Tools) to assess sustainability risks, including modern slavery. This includes 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 Strategy which is signed off by the University Executive.

Contracts and categories of contracts are assessed for risk and impact and 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.

As a result of the controls and systems the University has in place to manage recruitment and subcontracting, the risk of modern slavery on our campuses is considered low. However, 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 2020/21 we worked with our primary (Tier 1) supplier to address an identified issue around modern slavery in one of their (Tier 2) glove suppliers. An audit was conducted and although no issues were identified in the audit, issues were identified via other stakeholders. The Tier 2 supplier provided a very small proportion of gloves being used at the University of Edinburgh and action was taken so that no further gloves were sourced by our Tier 1 supplier from that supplier.

Other high risk imported goods include 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 has increased the vulnerability of many groups to human trafficking and modern slavery; particularly women and migrant workers. The economic downturn, travel restrictions and reduced scrutiny of working conditions has left many workers stranded without income or at risk of exploitation from employers.

Figure 1: Our sphere of influence where modern slavery risks may occur



4. Our policies and practices for the prevention and mitigation of human trafficking and modern slavery, including steps taken in 2019/20

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 procurement procedures and meet our mandatory 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. In 20/21 we developed an [Anti-Slavery Policy](#) for roll out in the 21/22 academic year. If a case of modern slavery were to be suspected on site, this would be fully investigated and appropriate disciplinary action would be taken against any member of staff found to have acted in breach of any relevant University policies.



Purchasing and supply chains

The [University's Procurement Strategy](#) outlines our ethical procurement approach and sets out our principles and practices for the acquisition of goods, services and building works. Relevant documents include our [Conflict Minerals Policy \(2016\)](#), [Palm Oil Policy \(2019\)](#), [Fair Trade Policy \(2004, updated 2013\)](#) and guidance on addressing 'fair work' practices in procurements. In 2020/21 we developed 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 and the 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 contributed to and adopted the [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. The University helped to update the Code of Conduct in 2019/20 and in 20/21 this updated Code has been integrated in every tender over £50,000.

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. Within the Laboratories category, first and second tier supply chains have been disclosed for gloves supply chains of suppliers to the APUC framework agreement for laboratory plasticware, glassware and sundries. We used this information to establish and address associated risks in those supply chains.

The University continues a longstanding commitment to fair trade and 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 valid through May 2020, and we are now working towards our resubmission. Our cafes stock a range of fairly traded products including fairly traded rice, chocolate, coffee, sugar, bananas and tea. The University shop also expanded its range of Fairtrade and Global Organic Textile Standard certified products.

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 2020/21, the University continued to work internally and with its partners to address some of these risks.

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 we buy 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



Prioritised procurement categories

 **Estates and construction**

 **Laboratories**

 **Travel**

 **Food and catering**

 **Information and Communication Technology**

Base map: PeterHermesFurian via Getty Images

Fundraising and income generation

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.

The Ethical Fundraising Advisory Group (EFAG) considers and advises on whether the sources and purposes of prospective donations and philanthropic fundraising to the University are ethically acceptable. Following a review of due diligence procedures, a University-wide committee entitled the Income Due Diligence Group (IDDG) will be established to screen wider income once working conditions allow post-Covid.

All potential donations in excess of £5,000 are subject to enhanced scrutiny in relation to a range of ethical issues, including modern slavery. Where due diligence checks indicate a significant issue or concern, the case will be passed to EFAG for review.

All submissions to EFAG are reviewed to examine the likely or known underlying source of funding for the donation. Any matters of public interest relating directly or indirectly to the donor, or the likely source of funding, is also reviewed. Comprehensive search terminology is applied which includes the terms “human right*”, “slave*”, and “victim*” to cover multiple variations.

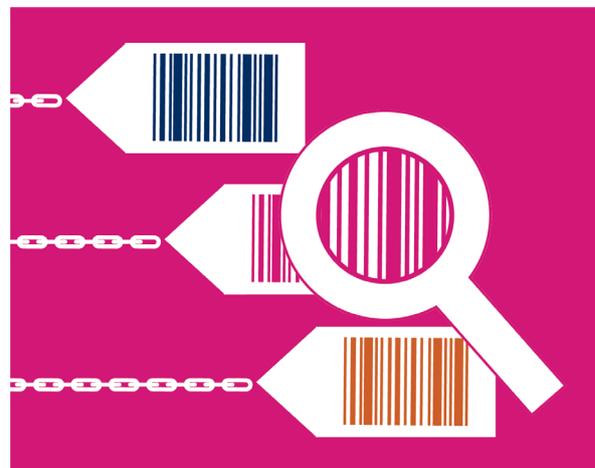
Companies are specifically cross-referenced against Ethical Consumer, Corporate Watch, Corporate Research Project’s Corporate Rap Sheets list and Violation Tracker, and the Business & Human Rights Resource Centre.

Specific countries are also reviewed to determine if there are any risks or concerns relating to a company or grant funder being based in a specific country or state owned, an individual is at a ‘governing’ level or linked to a specific country of interest. The resources employed include the UK Government Financial Sanctions List, Transparency International’s Corruption Perception Index, Amnesty International’s Country Reports, or Ethical Consumer’s Tax Haven List.

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 take steps to 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, the 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. The PRI carries out an assessment of our integration of the principles into our fund management and in our last assessment (2020) we received an A rating and were awaiting our 2021 assessment at the time of writing.



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. On September 9th 2020, International Day to Protect Education from Attack, the University along with Save the Children and Their World launched the Protecting Children in Armed conflict report with one of its focuses on child slavery and trafficking. In addition, a lecturer in the School of Social and Political Science, was awarded a six-month grant to study the impact of COVID-19 measures on modern slavery for Syrian refugees working in agriculture in the Middle East.

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.

In 2021, the three-year [Make ICT Fair EU-funded project concluded](#). The project, which involved ten partner organisations aimed to improve the lives of workers and those impacted along different stages of the ICT supply chain. The University led on research into labour issues and reviewed guidance produced by Make ICT Fair partners on the responsible procurement of ICT equipment. A copy of the final report is available [here](#).

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. The placement looked at the nexus between modern slavery and climate change producing recommendations for future action.

Our research contracts reflect the University's modern slavery approach. Research funders and collaborating partners are required to confirm equivalence (compliance?) 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. Templates used by the University for all international collaborations 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.



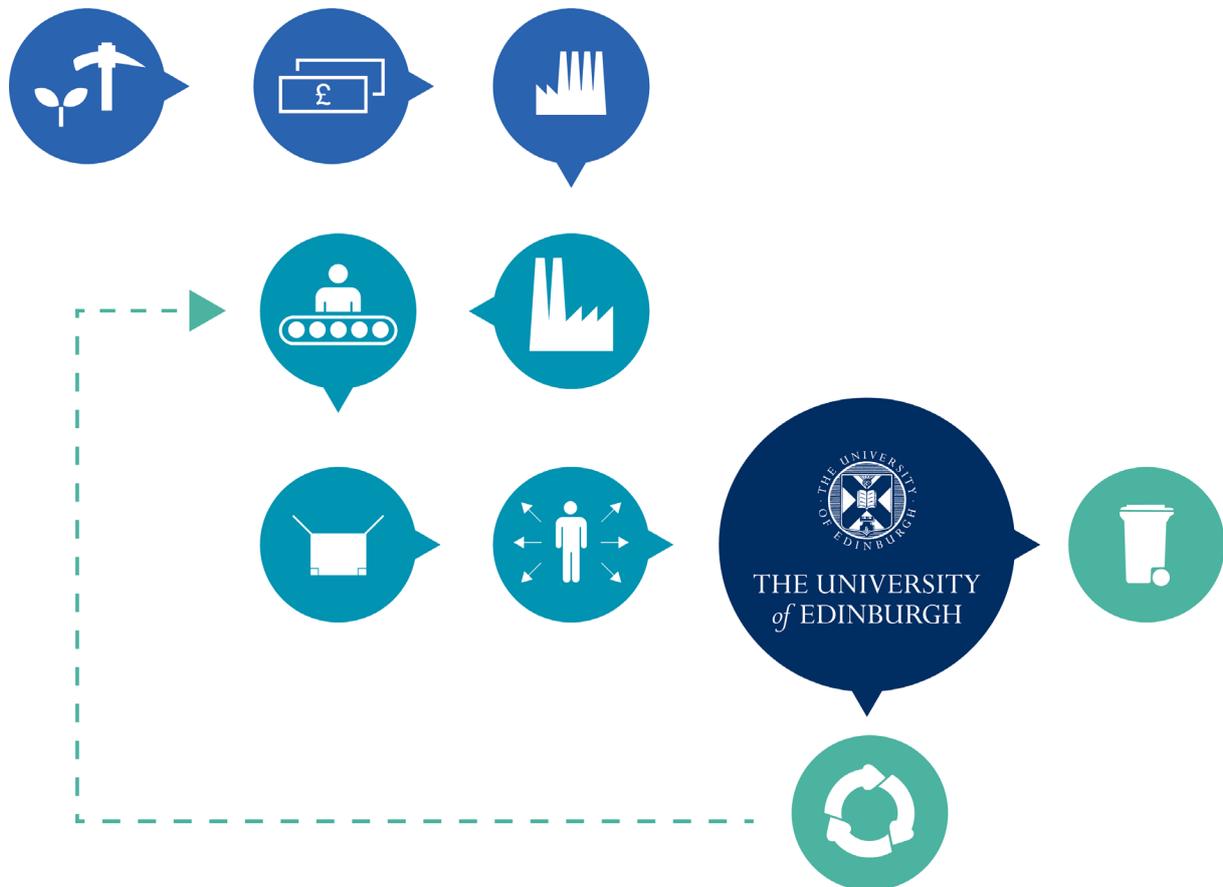
5. Training and capacity building

As a place of learning and study, we recognise our responsibility to raise awareness of the issue of modern slavery, and to train targeted groups specifically on modern slavery risks and best practices. We incorporated modern slavery awareness into our 2021 Fairtrade Fortnight social media campaign and posted about modern slavery issues at other points throughout the year. We also link to publicly available modern slavery resources and online courses [on our website](#).

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.

Our University Strategy 2030 commits us to integrating the global Sustainable Development Goals (SDGs) in our decision making. In 2020/21 we ran a workshop on our approach to embedding the SDGs including human rights related issues with senior managers who are part of the Sustainability, Social and Civic Responsibility Committee. This has helped to inform our approach to rolling out similar workshops with other senior teams around the University.

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.



Supply chains stages typically include primary production, manufacture, distribution, use and disposal, recycling or remanufacture.

6. Key Performance Indicators

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

| Key performance indicator | 2020/21 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 Sustain supplier database | This indicator will be updated in 21/22 as we switch to implement the EcoVadis tool |
| # 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 | c250 staff (tbc) have taken in-house online training on modern slavery. All MCIPs professionals in the Procurement Office are required to complete Ethical Procurement Training every year to maintain their chartered membership. c50 students have completed online training. 36 students have completed online training (to date, up to July 2020). |
| Reaching staff, students and the wider community: # event attendees and online page views related to modern slavery | 14,400 (estimated) |
| 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 2021/22, in addition to continuing the work outlined above, we will focus in particular on the following:

- Finalise and roll out an Anti-Slavery Policy clarifying responsibilities and accountabilities, setting out expectations for staff, students and other stakeholders, a process for raising concerns or grievances about policy violations and an explanation of how reports will be addressed.
- Continue to integrate modern slavery due diligence as part of our contract management activities and implement new tool for sustainability performance of supply chain (EcoVadis).
- Continue to raise awareness of modern slavery amongst staff and students.
- Develop further research collaborations related to modern slavery risks and solutions.
- Trial the Electronics Watch contract conditions in upcoming ICT procurement.
- Continue to undertake research and benchmarking activities to inform our approach

8. Approval and review

Date statement approved

29 November 2021

Final approval by

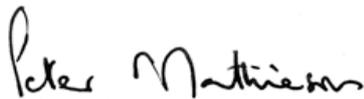
University Court

Consultations held

In addition to the Working Group members detailed above, the statement has been reviewed by the Social Responsibility and Sustainability Committee, University Executive, Audit & Risk Committee and University Court

Dates for review of statement

December 2022



For and on behalf the University of Edinburgh

8. Further information and contact

University approach to modern slavery:

www.ed.ac.uk/sustainability/what-we-do/supply-chains/initiatives/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
formats on request.



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