



# Modern Slavery Statement

## 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 has offices in Edinburgh, Midlothian, Beijing, Mumbai, Santiago and New York. It seeks to attract, develop, reward and retain the best staff for a world class teaching and research institution, and develops research, knowledge exchange and teaching partnerships and collaborations across the world. 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, forced and bonded labour, child labour, domestic servitude, and sex trafficking. 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 will act ethically and with integrity in all our relationships, and use all reasonable endeavours to take action directly and to influence others to ensure slavery and human trafficking is not taking place, wherever we can do so.

Our [Human Resources Policies](#) set out our commitment to workplace rights at the University. 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. We have a Whistleblowing Code of Practice which enables staff to report improper conduct or unethical behaviour.

We have a number of policies which govern our relationships with business. We have a published [University Procurement Strategy](#) which displays our principles and practices in the acquisitions of goods, services and works, and outlines how we will take steps to ensure an ethical procurement

approach. We have adopted the Advanced Procurement for Universities and Colleges (APUC) [Supply Chain Sustainability Policy](#) which promotes the 10 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 \(2016\)](#) and our [Fair Trade Policy](#) (2004, updated 2013), and our statutory duty to consider 'fair work' practices appropriately, locally and globally. Our [Responsible Investment Policy Statement](#) summarises the approach of the University in relation to investments.

#### 4. [Modern slavery risks in our supply chains and other areas](#)

We buy a wide range of goods and services, including 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, and do so in accordance with public procurement law. A large proportion is bought through frameworks established by collaborative consortia.

While the risks of modern slavery in our direct activities is likely to be low, we recognise that there are risks through the goods and services that we procure linked to supply chains around the world. In addition, given the global reach of our University, we recognise that there are potential risks of modern slavery occurring related to our activities around the world, especially when located in high risk countries.

We work with others, such as universities, procurement bodies such as APUC, civil society organisations, and government agencies, to inform and mitigate risks.

#### 5. [Steps we have taken and processes in place](#) - to identify and mitigate modern slavery risks:

**Preventing modern slavery on our own premises.** We are rigorous in checking that our staff 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 who have met the University's rigorous procurement procedures 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.

**Identifying and assessing potential risk areas in our supply chains.** The University uses tools developed with and provided and supported by the Scottish Government such as the Sustainable Public Procurement Prioritisation Tool (SPPT) and Life Cycle Mapping approach (based on United Nations precedents). In 2015-16, five categories were assessed (travel, electronics, food and catering, laboratory supplies, building supplies). Briefing papers summarising the risks and opportunities have been produced and action plans made. These are being [published on the University website](#) alongside the SPPT assessments themselves.

In 2016 we also carried out research specifically on modern slavery risks that could affect any aspect of university operations (on our own premises, in supply chains, in waste disposal, in our partnerships with others). We identified and engaged with relevant stakeholders across the institution through a workshop and further meetings and established a small cross-department working group on modern slavery.

**Excluding any suppliers which have been convicted of offences of child labour or other forms of trafficking in human beings.** Every regulated procurement process<sup>1</sup> conducted by the University requires potential suppliers to disclose whether the bidder<sup>2</sup> has been the subject of a conviction by final judgment within the last five years of any offence under Part 1 of the Human Trafficking and Exploitation (Scotland) Act 2015 or under any provision referred to in the Schedule to that Act. Any bidders with such conviction will automatically be excluded from the bidding process, unless they can sufficiently demonstrate reliability of changes to their practices.

**Monitoring risks and working with others on mitigation strategies.** When relevant suppliers sign up to the [APUC Supply Chain Code of Conduct](#) (which specifies that suppliers shall not use 'forced, involuntary or underage labour') and associated policies that are aligned to specific commodity areas, we expect them to conform. Through the APUC's SUSTAIN database, suppliers can 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 2016, we engaged with our three main Information and Communication Technology (ICT) suppliers on a range of social responsibility and sustainability issues including forced labour and conflict minerals.

In 2014, the University became a founding member of Electronics Watch, an organisation that works to ensure good working conditions in factories producing 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 work with civil society organisations in the countries where the factories are located to monitor working conditions.

**Listening to and protecting whistle-blowers.** The University adheres to The Public Interest Disclosure Act 1998 and implements its own Whistleblowing Policy regarding concerns about corruption, fraud or other malpractices within the University.

**Taking action if modern slavery cases are found.** If on site, any alleged violation of human rights will be fully investigated and appropriate disciplinary action will be taken against any member of staff found to have acted unethically and in breach of the University's commitment to human rights. If in our supply chains, the University in certain cases will have the right to terminate contracts where serious violations are discovered. In most cases we seek to engage, improve, highlight and recognise our responsibility to support the identification, mitigation and eradication of modern slavery in our supply base.

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<sup>1</sup> as defined in the procurement laws of Scotland

<sup>2</sup> itself or any person who is a member of its administrative, management or supervisory body or has powers of representation, decision or control therein

**Screening 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.

**Raising awareness of modern slavery and human trafficking among the University community.** In 2016 this included:

- A specific event on modern slavery during Fairtrade Fortnight to share expertise from researchers and invited practitioners along with an associated social media campaign. Follow up events took place in relation to our own strategies.
- Courses and research activities around the University on human rights (including slavery and human trafficking) such as: the LLM in Human Rights, the Global Citizenship Initiative and the Global Justice Academy.
- Outreach and engagement with the sector at conferences, community of practice events, and through webinars and briefings.

**Assessing our effectiveness in combating slavery and human trafficking.** We seek to continually improve our approach. In 2016 we undertook research to look at approaches within and outside of the sector.

**Further steps** – will be reviewed and prioritised in 2016/17 including:

- **Research and risk assessment:** We will continue to research and assess risks in prioritised procurement categories, including initiating academic and student research projects to inform our approach. In future years we will identify opportunities to further understand and mitigate modern slavery risks in investments. We will promote investment in research and knowledge exchange to address root causes of modern slavery and link research, learning and teaching opportunities to our own practices.
- **Supplier engagement:** We will continue to ask identified suppliers about their actions to tackle modern slavery in their supply chains, including the issue of conflict minerals, in line with our Conflict Minerals Policy (2016). We will work with others to ensure focus on modern slavery in all priority regulated contracts. Where appropriate we will also encourage sharing of information within our supply base.
- **Raise awareness:** We will seek to ensure greater awareness of modern slavery risks among staff and students, and identify training opportunities available.
- **International linkages:** We will review and further develop links between our procurement and HR procedures and those undertaken in our International Offices, to share learning.
- **Monitoring and evaluation:** We will review approaches and KPIs to measure, monitor and evaluate.

## 6. Approval and review

<b>Date statement approved</b>	<b>5 December 2016</b>
<b>Final approval by</b>	University Court
<b>Consultations held</b>	Stakeholder workshop including staff from Procurement, Legal Services, Court Services, Social Responsibility and Sustainability, Human Resources, International Office, Waste, and academics with legal and international development expertise. Email consultation with Accommodation, Catering and Events, Development and Alumni, Research Support Office, Information Services. Reviewed at SRS Committee and Audit and Risk Committee.
<b>Dates for review of statement</b>	December 2017



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Professor Sir Timothy O'Shea

Principal and Vice-Chancellor

For and on behalf the University of Edinburgh

Date: 7<sup>th</sup> December 2016

## 7. 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) | 0131 650 4065

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