



THE UNIVERSITY *of* EDINBURGH



Modern Slavery Statement

2018/19

For the period 1 August 2018 to 31 July 2019



**Social Responsibility
and Sustainability**



The University of Edinburgh

Modern Slavery Statement 2018/19

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 constitutes the University of Edinburgh's slavery and human trafficking statement for the financial year beginning 1 August 2018 and ending 31 July 2019. It sets out the steps the University has taken and will take across our research, teaching and operational activities 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 Professional Services 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 a significant amount 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, sexual exploitation, 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 within our

direct operations and our wider sphere of influence to ensure slavery and human trafficking are not taking place. We are committed to continue researching, teaching and raising awareness on modern slavery issues.

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 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 is bought through frameworks established by collaborative consortia,

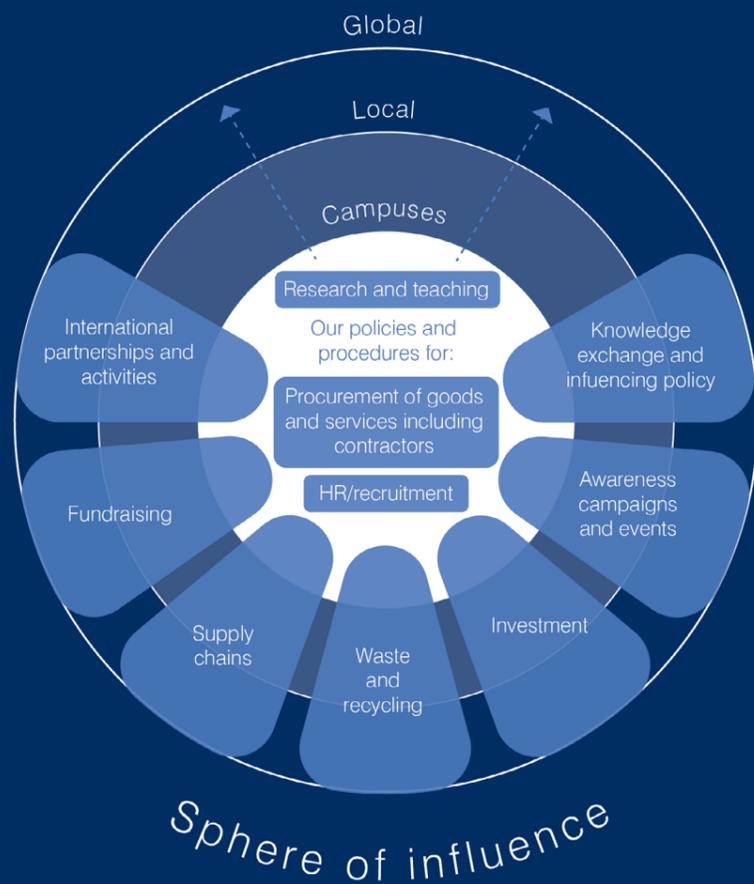
particularly Advanced Procurement for Universities and Colleges (APUC). A copy of the APUC's Modern Slavery Statement can be found on [their website](#).

Due to controls and systems the University has in place to manage recruitment and subcontracting, the risk of modern slavery on our campuses is low. We recognise, however, that there are risks in the supply chains of goods and services we procure. 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.

By its very nature, modern slavery is hard to detect and is often hidden within 'legitimate' industries. 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.

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



5. Our policies and practices

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 any sub-contractors used, and to promote 'fair work' practices, as appropriate. Contracted workers that regularly work onsite at the University are required to be paid the living wage as defined by the [Living Wage Foundation](#).

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. Bullying, harassment and discrimination are known to be unacceptable. We are committed to fair, progressive and ethical business practices and have signed the [Scottish Business Pledge](#). The University adheres to [The Public Interest Disclosure Act 1998](#) and implements its own [Whistleblowing Code of Practice](#) regarding concerns about potential corruption, fraud or other unlawful practices within the University. 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.



Managing risk in our supply chains

We have a published [University Procurement Strategy](#) which sets out our principles and practices for the acquisition of goods, services and building works and outlines our ethical procurement approach. The University contributed to and has adopted the APUC [Supply Chain Sustainability Policy](#), which is based on the Ten Principles of the UN Global Compact. Relevant suppliers are asked to sign the [APUC Supply Chain Code of Conduct](#) upon entering into a contract with the University. 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. Within the University, other relevant documents include our [Conflict Minerals Policy \(2016\)](#), our [Fair Trade Policy \(2004, updated 2013\)](#) and guidance on meeting our statutory duty to address 'fair work' practices in procurements. These commitments help us to support social responsibility both globally and locally.

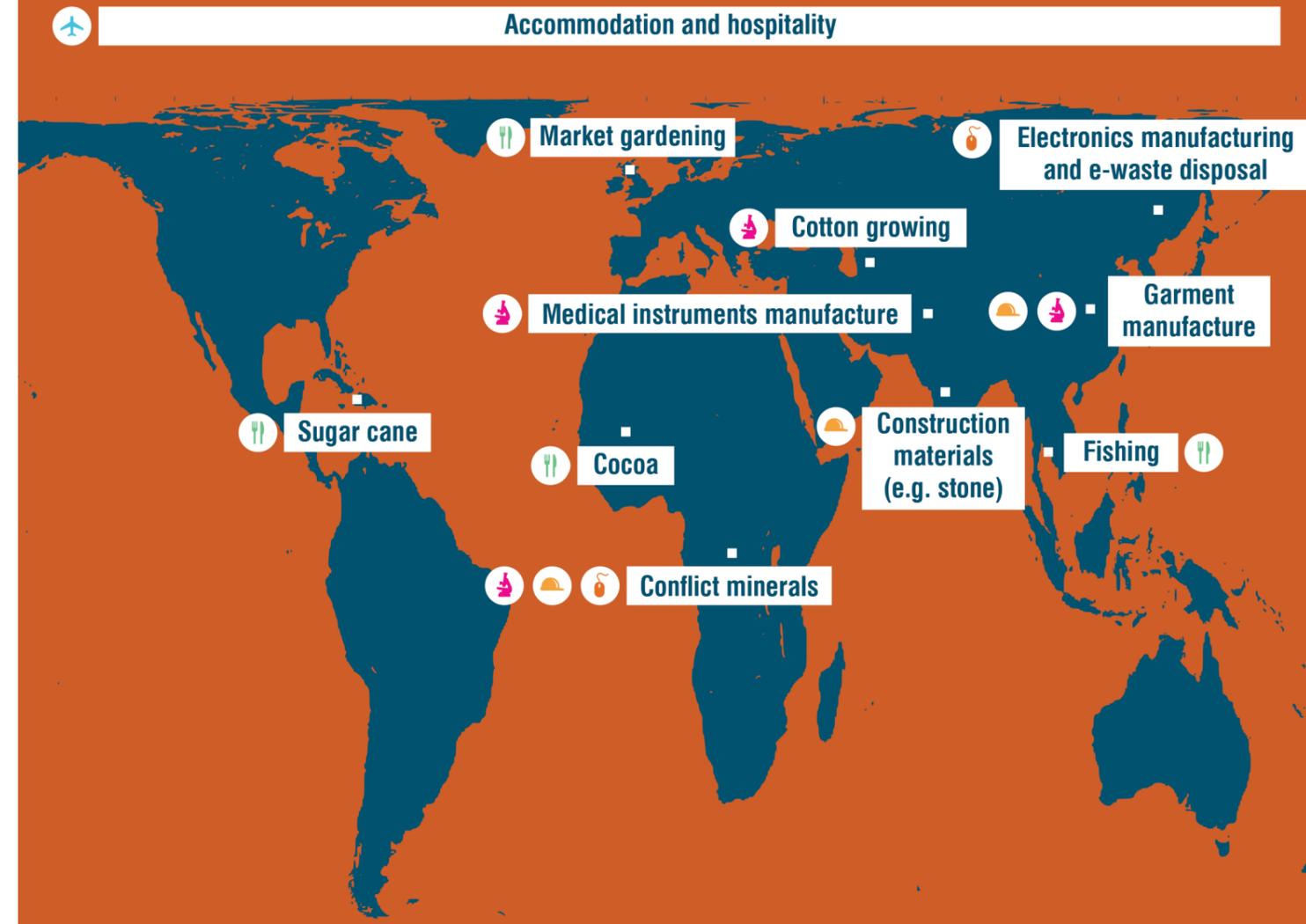
To identify potential risk areas in our supply chains, the University uses tools provided by the Procurement Directorate in the Scottish Government, such as the [Sustainable Public Procurement Prioritisation Tool \(SPPPT\)](#) and [Life Cycle Mapping approach](#) (based on United Nations precedents), to assess sustainability risks in prioritised procurement categories (travel, electronics, food and catering, laboratory supplies, building supplies). [Briefing papers](#) and action plans summarising the category risks and opportunities have also been produced. The process leads to next steps for different groups in the University, including procurement actions, research questions and operational changes to consider. Modern slavery is highlighted as a risk throughout, and appropriate questions to ask bidders or suppliers during the procurement process are recommended. As the first organisation to fully make use of these tools, we shared our learning with others and invested resources to further develop the tools. In 2017/18 we carried out a review of our food and catering, electronics and laboratory SPPPT assessments.

We recognise there are risks of modern slavery in the supply chains for all types of goods and services, and that in many cases, whether exploitation is taking place or not is unknown. However, we have also identified some key known risk areas related to our supply chains, highlighted by research and media reports, and are using these tools and procedures to mitigate these risks. These higher risk areas include food, such as fishing in Thailand and neighbouring countries, cocoa in parts of West Africa, sugar cane in the Caribbean, market gardening in the UK; construction materials, including stone from India and China; garment production, including cotton growing in Uzbekistan and factories in East Asia; electronics manufacturing, particularly in East Asia; and e-waste disposal. The risk of modern slavery is reported to have marginally increased in the UK and rest of Europe, particularly in relation to migrant workers.

Through the [Sustain](#) supplier sustainability monitoring tool, which is managed by APUC, prioritized suppliers are asked to provide details of their own recruitment practices along with measures they take in relation to modern slavery in their supply chain. Where risks have been identified in relation to existing contracts, we work with APUC or other consortia, or directly with the supplier, 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.

This map shows some 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.



Prioritised procurement categories

- 

Estates and construction
- 

Laboratories
- 

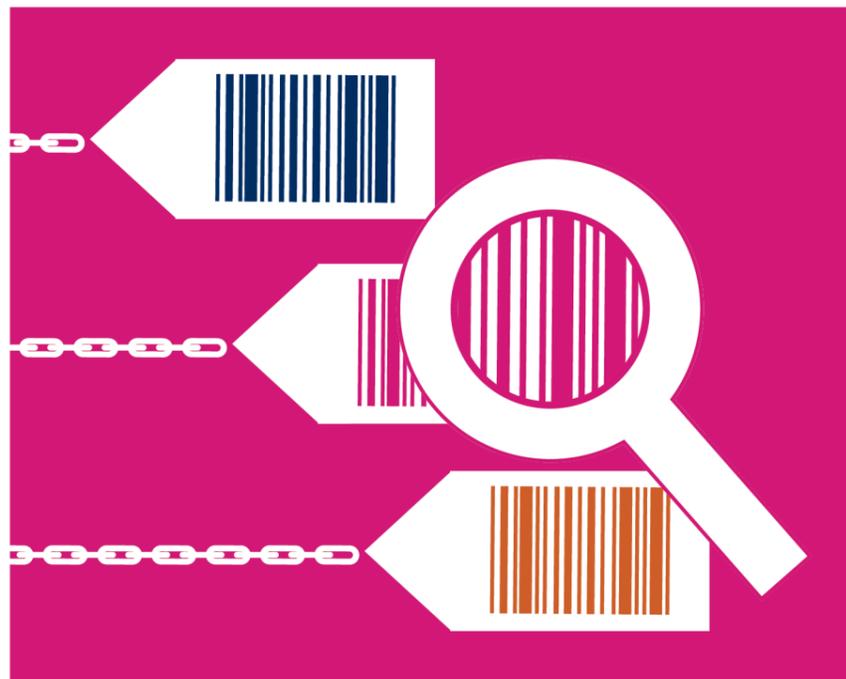
Travel
- 

Food and catering
- 

Information and Communication Technology

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 public sector members across Europe. Our 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. 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.



University terms and conditions for suppliers

In May 2018 we published and began using new [terms and conditions](#) for the University's purchase contracts which 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 and; d) notify the University of any breaches and provide the University with annual compliance reports.

Compliance with the Modern Slavery Act as well as International Labour Organization (ILO) conventions are highlighted in contract notices, European Single Procurement Document

checks, as well as Invitation to Tender documentation, where relevant. These measures were also extended to non-regulated construction procurements last year. We have also created templates to request more information from suppliers about Modern Slavery Act and ILO Convention compliance if we have concerns about the reliability of information provided in this regard. As well as more general requests for supplier statements, the Procurement Office requests awarded suppliers for further evidence of their effectiveness in monitoring their supply chain, where it is deemed appropriate.

The University has also adopted a [Purchase Order Policy](#) (known as 'No PO, No Pay') 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.

We have also produced guidance for our suppliers regarding our social responsibility and sustainability priorities, including modern slavery. 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.

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 increases 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 are 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.

Our research contracts also reflect the University's modern slavery approach. Our due diligence process requires research funders and collaborating partners to confirm equivalence with the University's ethical commitments. All staff in the Edinburgh Research Office have been briefed on modern slavery risks.

Teaching and academic research

The University provides 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.

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 recent years we have hosted a number of students undertaking dissertation projects related to human rights in University supply chains. This has included an examination of electronics and vehicle supplier progress related to conflict minerals.

When it comes to research, awareness of modern slavery risks has been incorporated into Ethical Research Partnerships guidance for staff and students working with other organisations and institutions overseas. The Academic Collaboration Agreement templates used by our Edinburgh Global department and Edinburgh Research Office have been updated to take into account modern slavery risks. Edinburgh Research Office continues to implement measures designed to counter modern slavery in its policy frameworks.

6. Specific steps we have taken in 2018/19 to identify and mitigate modern slavery risks

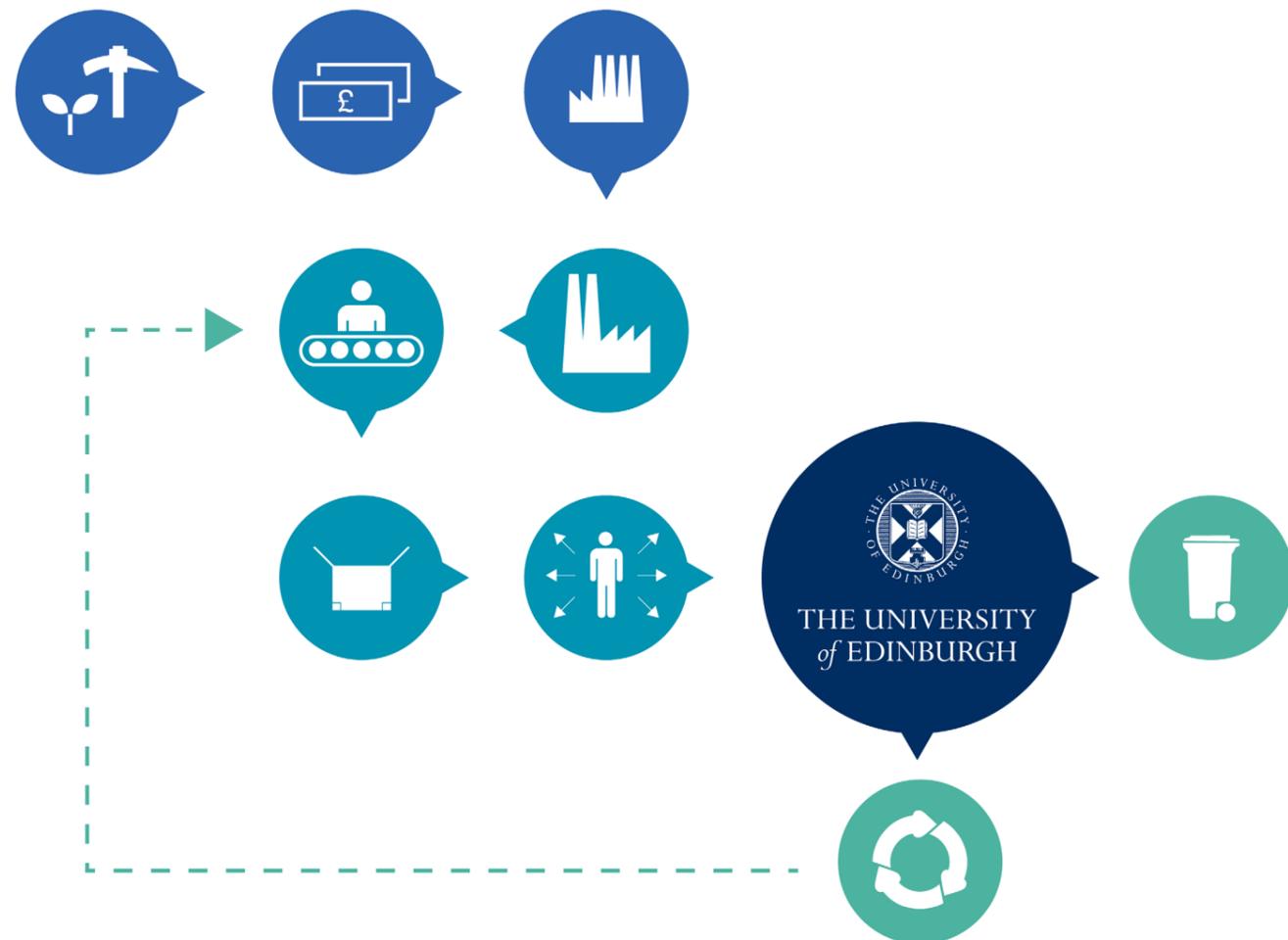
Procurement and supplier engagement

Throughout 2018/19, the University supported the ongoing rollout of the Sustain supplier sustainability monitoring tool for the Scottish Further and Higher Education sector, by devoting resource to increasing the number of supplier verifications and providing feedback to APUC. APUC are continuing to develop Sustain and undertake assessments of high risk suppliers on sectoral framework agreements. 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.

APUC are working to establish and address any associated risks in those supply chains, working in collaboration with partner organisations also using these suppliers.

The University will continue to develop its approach to supply chain monitoring, including undertaking Sustain verifications of relevant direct suppliers. In spring and summer 2019, the Department for Social Responsibility and Sustainability funded a PhD internship to review a number of tools and methods for monitoring supply chain sustainability issues like modern slavery, and we are now considering next steps.

In November 2018, the Procurement Office and Department for Social Responsibility and Sustainability hosted an event for suppliers to learn about our social responsibility and sustainability commitments and best practice. In May 2019, the University passed a [Palm Oil Policy](#) setting out our commitment to purchase products made from sustainable palm oil that meets high standards of environmental protection, local community relations and workers' rights.



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

Research and knowledge exchange

We have continued to collaborate with ten partner organisations on the EU-funded three-year project entitled [Make ICT Fair](#), which is entering its third year. This includes carrying out research on labour issues in electronics supply chains, and working on pilot procurement projects related to mitigating the social and environmental impacts of mining. The Procurement Office has met with the University Research Fellow leading field research for the Make ICT Fair project, with the aim to ensure that insight from their research on factory conditions in East Asia are captured in the University's procurement process.

We have academics actively engaged in research projects that evaluate the real-world impact and potential of the UK's Modern Slavery legislation. Publications speaking to this include three published jointly by Edinburgh and University of Sheffield academics, titled 'From International Law to National Law: The Opportunities and Limits of Contractual CSR Supply Chain Governance', 'Sustainable Global Supply Chains: From Transparency to Due Diligence' and 'Reconciling Human Rights and Supply Chain Management through Corporate Social Responsibility'.

As part of a broader study investigating the intersection between criminal law and employment law, academics are producing research papers and book chapters that contribute towards an edited collection to be published by Oxford University Press in 2020. The title of the book is "Criminality at Work" and a number of the chapters focus on how the Modern Slavery legislation (1) interacts with other legislation imposing immigration controls that purport to criminalize undocumented and precarious workers, (2) could be interpreted broadly by the courts to cover unpaid domestic work, and (3) tends to protect gender-segmented roles predominantly performed by females.

University of Edinburgh researchers are also contributing to CATRIS; a new 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 partnership is still in its infancy but will be developing useful tools, including a repository for all anti-trafficking and anti-slavery research being produced in Scottish universities.



In summer 2018, the University's Department for Social Responsibility and Sustainability hosted an 8 week student dissertation placement as part of the LLM in Human Rights work-based placement programme. The placement looked at best practice in combatting modern slavery. The aim of this research was to identify next steps for improving our approach. The student completed their dissertation and presented a series of recommendations for the University at the August meeting of our Modern Slavery Working Group, which we are now considering.

Awareness and training

As a community of over 15,000 staff and 41,000 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.

We incorporated modern slavery awareness into our 2019 Fairtrade Fortnight social media campaign. We continue to hold a [two-star Fairtrade University award](#) from the Fairtrade Foundation and National Union of Students for our whole institution approach to promoting and embedding fair trade.

We have continued to promote an online training course for staff, to raise awareness about what modern slavery is, how to recognise signs of exploitation and what steps should be taken if a staff member suspects exploitation is taking place. From July 2019, completion of this course was made mandatory for all staff members with authority to approve financial transactions. Last year we also developed a version of this course specifically for students.

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

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 also started 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. We will continue our work on this over the coming year.

Responsible investment

Last year we reported that our Director of Finance had written to University fund managers asking about their approach to human rights and modern slavery in investment. This culminated in an engagement event in September 2019 involving representatives from the PRI and fund managers who had expressed interest in developing a shared understanding of human rights due diligence. Following this event, the PRI undertook research into investment portfolios and modern slavery.

Working together

Our Modern Slavery Working Group includes representatives from the Department for Social Responsibility and Sustainability, Procurement Office, Human Resources Department, Edinburgh Global, Edinburgh Research Office, Edinburgh University Students Association, School of Law, School of Social and Political Science, students, Legal Services, Development and Alumni, Communications and Marketing and Court Services. We 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 raised awareness of potential risks and best practices within different departments.

Lessons learned

- Modern slavery is a complex and often hidden issue – reducing the risk requires collaboration from many stakeholders.
- While procurement and supply chains remain major risk areas, universities should consider risks related to all other areas of their operations which can be equally complex, going beyond the minimum requirements of the Modern Slavery Act.
- Despite much UK media attention on the existence of modern slavery locally and globally in recent years, many staff and students are not aware of the issue. There remains a need to continue focus on raising awareness of risks and what actions people can take.

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

Key performance indicator	2018/19 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)	50 directly engaged. All suppliers engaged indirectly through new terms and conditions and self-declaration requirement.
# suppliers providing information on modern slavery efforts on Sustain supplier database	39 published reports, 27 in progress, 107 invited 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	116 staff have taken in-house online training on modern slavery (to date, up to July 2019). All MCIPs professionals in the Procurement Office complete Ethical Procurement Training every year to maintain their membership. 22 students completed online training (to date, up to July 2019).
Reaching staff, students and the wider community: # event attendees and online page views related to modern slavery	Over 45,000 (to date, up to July 2019)
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.

Next steps

In 2019/2020, in addition to continuing the work outlined above, we will focus in particular on the following:

- Continue to raise awareness of modern slavery amongst staff and students, including international staff.
- Supplier engagement, including through the Sustain database and face to face events.
- Work to implement our Palm Oil Policy 2019, beginning with an assessment of food products purchased by the University's Department for Accommodation, Catering and Events.
- Review recently updated Electronics Watch best practice guidance and contract conditions, with the aim of implementing these where appropriate in future procurements.
- Develop further research collaborations related to modern slavery risks and solutions.
- Continue our work to research and develop context-specific advice regarding taking action on modern slavery for people working in different parts of the world.
- Complete a planned update of the online funding guidance for researchers, giving prominence to modern slavery issues.
- As a result of regular review of due diligence procedures, the University is developing plans to expand the remit of its Ethical Funding Advisory Group so that all streams of research funding whose source raises potential red flags in relation to a range of ethical issues, including modern slavery, will be subject to enhanced scrutiny.
- Review grievance mechanisms and access to remedy for modern slavery victims.
- Identify opportunities to support victims of modern slavery and further address the root causes of modern slavery.
- Explore opportunities to further address modern slavery risks in University supply chains via the new Sustainable Procurement Group, led by the Procurement Office.
- As part of implementing a new Core System and the creation of a new Contracts Management team within Procurement, review the inclusion of Modern Slavery KPIs and figures as part of a wider range of reportable statistics.

7. Approval and review

Date statement approved

2 December 2019

Final approval by

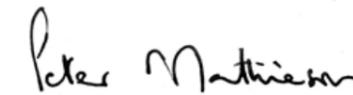
University Court

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 and Risk Committee and University Court.

Dates for review of statement

December 2020



For and on behalf the University of Edinburgh

Date:

10 January 2020

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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