



THE UNIVERSITY *of* EDINBURGH



# Modern Slavery Statement

2017/18



**Social Responsibility  
and Sustainability**



# The University of Edinburgh

## Modern Slavery Statement 2017/18

### 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

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

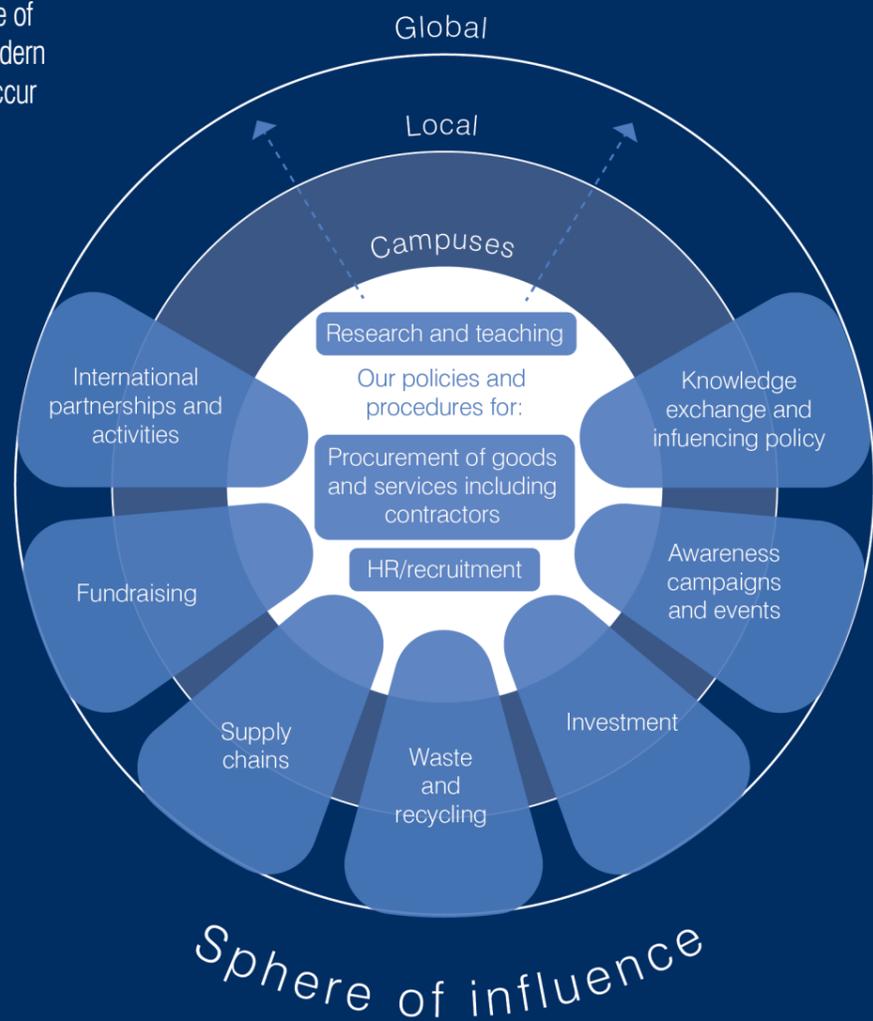
#### People working on our campuses

Our [Human Resources Policies](#) set out 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.

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



## Our supply chains

We have a 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, prioritised 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.

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 global supply chains, highlighted by research and media reports, and are using the aforementioned tools and procedures to mitigate these risks. These 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 manufacturing 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, in particular in relation to migrant workers.

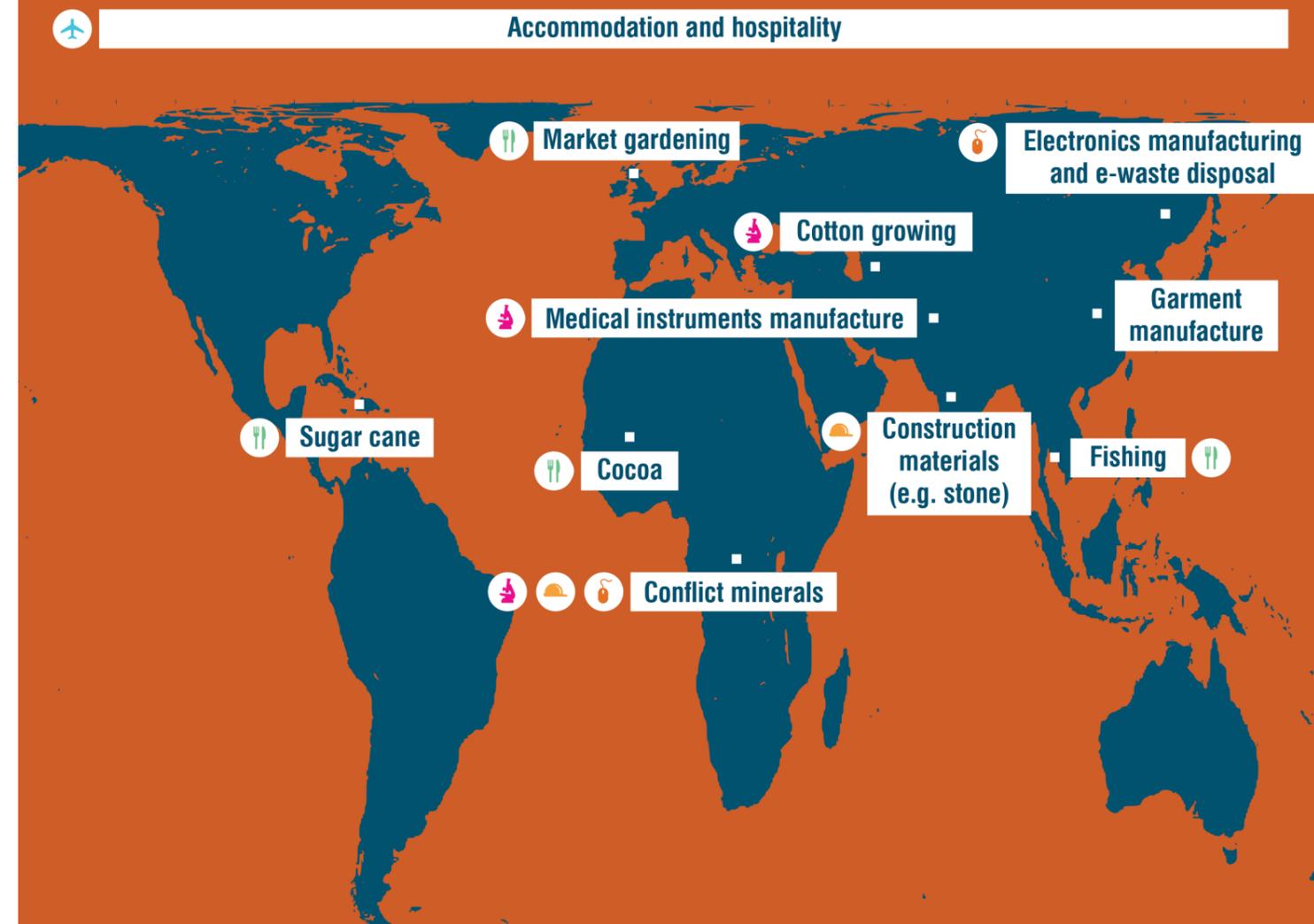
Where risks have been identified in relation to existing contracts, we work with APUC or other consortia, or directly, to raise social responsibility questions including human rights issues at contract management meetings with our key suppliers, assess publicly available reports from companies, and follow-up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

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.



## What is Sustain?

[Sustain](#) is a supply chain sustainability monitoring tool that is developed and administered by the [Advanced Procurement for Universities and Colleges \(APUC\)](#). Its purpose is to assess how suppliers comply with the social, environmental and ethical standards set out in the [APUC Supply Chain Code of Conduct](#).

The tool evaluates suppliers against a number of detailed requirements that are categorised into 13 key themes, including recruitment practices and terms of employment. Requirements are classified as either 'bronze' (minimum or legally required practices), 'silver' (good practices) or 'gold' (leading or best practices).

Sustain asks suppliers to self-assess their performance, and to upload supporting evidence or comments. Each submission is then reviewed by a verifier from APUC, or an APUC member institution. All verifiers are certified [SA8000](#) auditors.

Suppliers are also asked to disclose their sub-tier supply chains, with a particular focus on suppliers that play a significant role in delivering the framework or contract. Sustain uses this information to create a country risk map.

The results of are shared with the supplier and relevant Procurement Managers from APUC and member institutions. A summary score based on the number of bronze, silver and gold requirements fulfilled is also published [online](#).



Estates and construction



Laboratories



Travel



Food and catering



Information and Communication Technology



## Research Funding

We have ensured that contracts for research funders make reference to the University's modern slavery approach. Potential research funders and collaborating partners are required to provide ethical statements or sign up to respect the University's ethical commitments. All staff in our Research Support Office have been briefed on modern slavery risks.

## Awareness and training

As a community of over 14,000 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 Fairtrade Fortnight social media campaign. We received a two-star Fairtrade University award from the Fairtrade Foundation and National Union of Students for our whole institution approach to fair trade.

We have produced and promoted an online training course for staff, to raise awareness about modern slavery risks and what steps should be taken if a staff member suspects exploitation is taking place. Procurement staff are 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 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 has been incorporated into Ethical Research Partnerships guidance for staff and students working with other organisations and institutions overseas. Our Academic Collaboration Agreement templates in Edinburgh Global and the Research Support Office have also been updated to take into account modern slavery risks.

## Responsible investment

We contacted all our fund managers to ask about their approach to human rights and modern slavery in investment. We are making plans to hold further face to face discussions with several fund managers who expressed interest in developing a shared understanding of human rights due diligence in investment.

## 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, Court Services, and Development and Alumni. 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.

Our whole institution approach to modern slavery initiative has been shortlisted as a finalist for the Green Gown Awards 2018, denoting recognition by the Further and Higher Education Sector.

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

## 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 to focus on raising awareness of risks and what actions people can take.

## Key performance indicator

## 2017/18 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

24 published reports, 10 in progress, 41 invited in total

### # 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)

62 staff have taken in-house online training on modern slavery so far, launched in May 2018 (up to July 2018).

All MCIPs professionals in the Procurement Office complete Ethical Procurement Training every year to maintain their membership

### Target = 1,000, focusing on most relevant staff groups

### Reaching staff, students and the wider community: # event attendees and online page views related to modern slavery

Over 35,000

### Collaborations with others

We have collaborated with Electronics Watch, APUC, EAUC, NUS, HEPA, and the Scottish Government.

## Next steps

In 2018/19, in addition to continuing the work outlined above, we will focus in particular on the following:

- Continue to promote online training on modern slavery risks for relevant groups of staff, including internationally
- Develop and promote a student version of our online training
- Supplier engagement, including through the Sustain database and face to face events
- Improve contract database systems to be able to verify where modern slavery has been considered in all types of contracts
- Further develop and implement our position in relation to palm oil and links to human rights and modern slavery
- Developing further research collaborations related to modern slavery risks and solutions.
- Further review modern slavery and human rights due diligence in investment with fund managers and other relevant stakeholders
- Carry out research and collaboration to develop context-specific advice regarding taking action on modern slavery for people working in different parts of the world
- Develop a detailed implementation plan for monitoring our modern slavery work

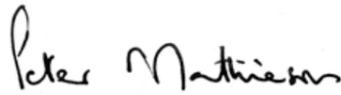
## 7. Approval and review

**Date statement approved** 3 December 2018  
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**Final approval by** University Court  
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**Consultations held** In addition to the Working Group members detailed above, the statement has been reviewed by the Social Responsibility and Sustainability Committee, Audit and Risk Committee and University Court

**Dates for review of statement** December 2019

  
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For and on behalf the University of Edinburgh

**Date:** 19 December 2018  
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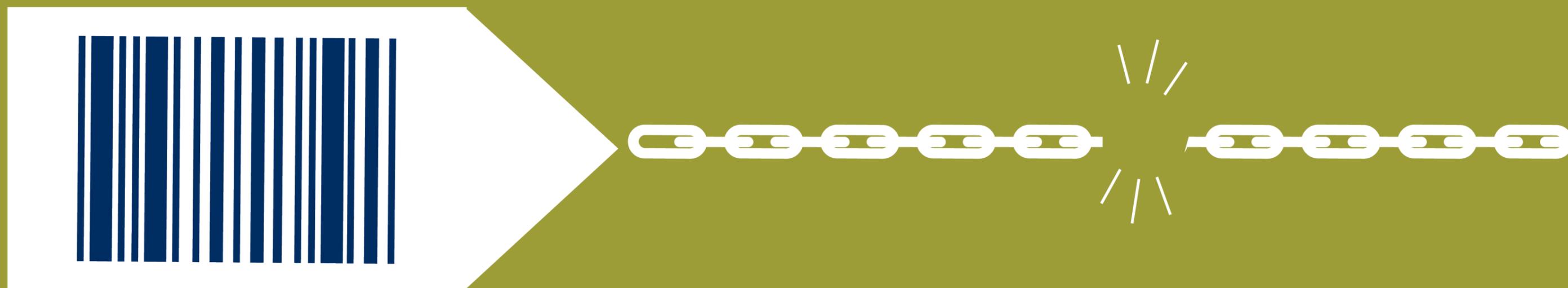
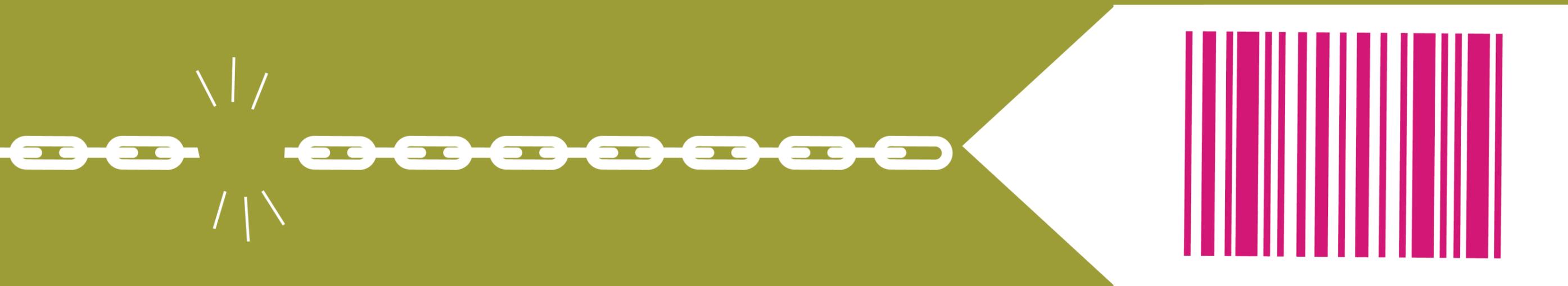
## 8. Further information and contact

**University approach to modern slavery:**

[www.ed.ac.uk/about/sustainability/what-we-do/supply-chains/initiatives/modern-slavery](http://www.ed.ac.uk/about/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  
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and it can be made available in alternative  
formats on request.



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