



THE UNIVERSITY *of* EDINBURGH



Modern Slavery Statement

2019/20

For the period 1 August 2019 to 31 July 2020



**Social Responsibility
and Sustainability**

The University of Edinburgh

Modern Slavery Statement 2019/20

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 2019 and ending 31 July 2020. 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.

2. 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.

3. 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 2019/20 academic year, the University comprised roughly 15,448 staff and 44,510 students, with an annual turnover of £1,120.1million.

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. In March 2020, like others around the world, we paused travel and most of our staff and students switched to working and studying remotely while we prepared for hybrid (blending remote and in-person) teaching in Semester 1 of 2020/21.

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 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 2019/20 financial year was £251million, with thousands of unique suppliers. We awarded 117 regulated public procurement contracts during this period for a value of £170million, with 67 of these won by SME contractors. £48million of this spend came through collaborative contracts, and we spent £55K with supported businesses.



4. 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 the Scottish Government's [Sustainable Procurement Tools](#) to assess sustainability risks, including modern slavery, in 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 Category Strategies. Each Strategy

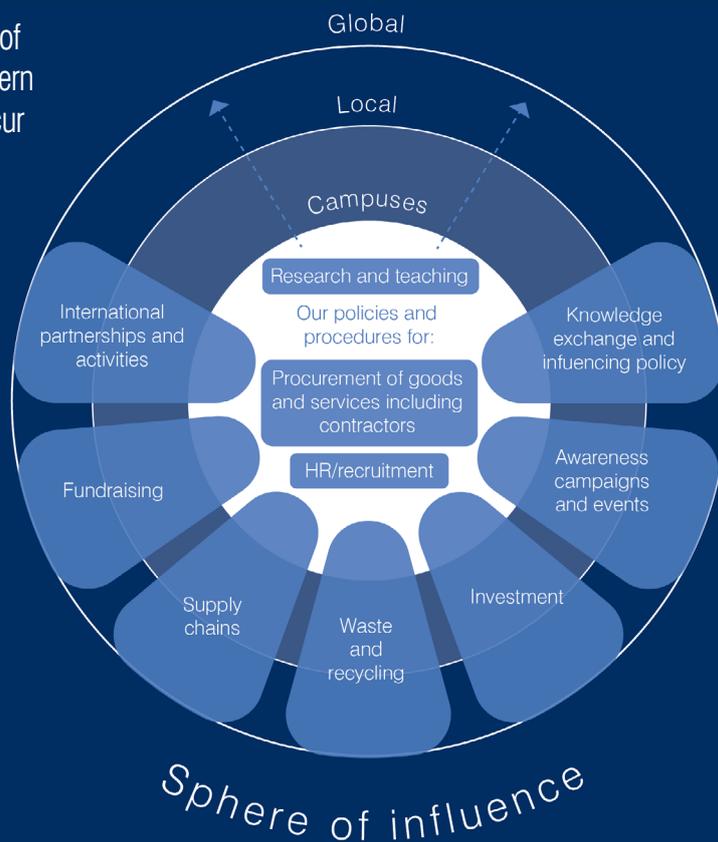
contains a sustainability section where upcoming high-priority procurements and risk mitigation actions are identified, including for modern slavery concerns. We aim to work collaboratively with other universities, procurement bodies such as the APUC, civil society organisations and government agencies to share information and mitigate risks.

Due to controls and systems the University has in place to manage recruitment and subcontracting, the risk of modern slavery on our campuses is considered low. 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.

Supply chain risks

We have identified a number of potential risk areas related to our supply chains, highlighted by our research and media reports. 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 laboratory equipment including gloves and surgical instruments. 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



5. 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 rigorous procurement procedures and meet our imposed selection criteria regarding their employment policies and practices. For example, agencies are asked to identify and 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. 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. We also produce annual Category Strategies to assist in managing specific issues and risks. Other 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. These commitments help us to support social responsibility both globally and locally.

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 as well as 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.

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 are using this information to establish and address associated risks in those supply chains.

The University continues to maintain its longstanding commitment to fair trade and expand its approach to ethical supply chains. We were most recently awarded a [two-star Fairtrade University Award](#) from Fairtrade Foundation and NUS 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. This year we expanded the number of fairly traded product lines stocked in University outlets. Our cafes now stock Tony's Chocolonely confectionary (in addition to 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.

This year we continued to provide feedback to support the development of the Sustain supplier sustainability monitoring tool, which is managed by APUC. The tool now incorporates enhanced modern slavery questions. Going forward, it will be used to gather information from critical suppliers about practices including recruitment and working conditions, and to follow up as required. We have also produced guidance for our suppliers regarding our social responsibility and sustainability priorities, which points to modern slavery resources.

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. During this period, the University has worked internally and with its partners to address some of these risks. This included engaging a major supplier with a Covid-19-related risk assessment produced by Electronics Watch and the United Nations. We have also assessed Modern Slavery risks in our PPE supply chains by checking our spend and catalogues for the presence of products produced by companies sanctioned by the United States government for labour and human rights violations. It is our plan to discuss how to address these risks more collaboratively with other public sector buyers over the coming year.

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 year, the University included information and scored questions about Electronics Watch in two large ICT procurements. These set out our expectation that successful suppliers should engage seriously with Electronics Watch. We are now preparing to pilot the Electronics Watch contract conditions in an upcoming ICT procurement.

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

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.

Following a planned review of due diligence procedures this year, the University established an

Income Due Diligence Group (IDDG). The purpose of this group will be to ensure that all streams of funding whose source raises potential red flags in relation to a range of ethical issues, including modern slavery, are subject to enhanced scrutiny.

The University screens all potential donations in excess of £10,000 for a number of factors, which includes any potential connection to modern slavery. Where due diligence checks indicate a significant issue or concern, the case will be passed to the Income Due Diligence Group for review.

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 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, 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. PRI carries out an assessment of our integration of the principles into our fund management and we continued to receive an A rating in 2020.



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. University academics contributed to the book *Criminality at Work*, published in 2020, which includes chapters focusing on Modern Slavery legislation. In the wake of Covid-19, academics have written about [labour abuses in PPE manufacturing](#) and the [impact of the UK's Coronavirus Job Retention Scheme on UK Employment law](#), which puts certain groups at greater risk of exploitation. Academics have also published work critically analysing how business and human rights discourse feeds into larger questions about reinforcing human rights protections.

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.

This year we maintained our collaboration with ten partner organisations on an EU-funded three-year project entitled [Make ICT Fair](#), now in its final year. The project aims to improve the lives of workers and those impacted along different stages of the ICT supply chain. This year, the University conducted research into labour issues in Indonesian electronics factories and reviewed guidance produced by Make ICT Fair partners on the responsible procurement of ICT equipment.

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. This year, the University's Department for Social Responsibility and Sustainability hosted a student from the School of Law's LLM in Human Rights for an 8 week work-based placement. The placement looked at how the University could implement a human right-compliant grievance mechanism and provide access to remedy for modern slavery survivors. The student presented a series of recommendations to the University's Modern Slavery Working Group, which we are now taking forward.

Our research contracts reflect the University's modern slavery approach. Research funders and collaborating partners are required to confirm equivalence with the University's ethical commitments. All staff in the Edinburgh Research Office (ERO) have been briefed on modern slavery risks. This year our Modern Slavery Awareness course was added to the ERO's 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. The Academic Collaboration Agreement Templates used by our Edinburgh Global Department and Edinburgh Research Office 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.

In 2019/20, the University's Research Ethics and Integrity Review Group began developing University policy and practice on safeguarding and harm prevention, the scope of which includes modern slavery and exploitation. The group is working to implement the recently published UKCDR Guidelines on Safeguarding in International Development Research. This work will continue over the coming year.



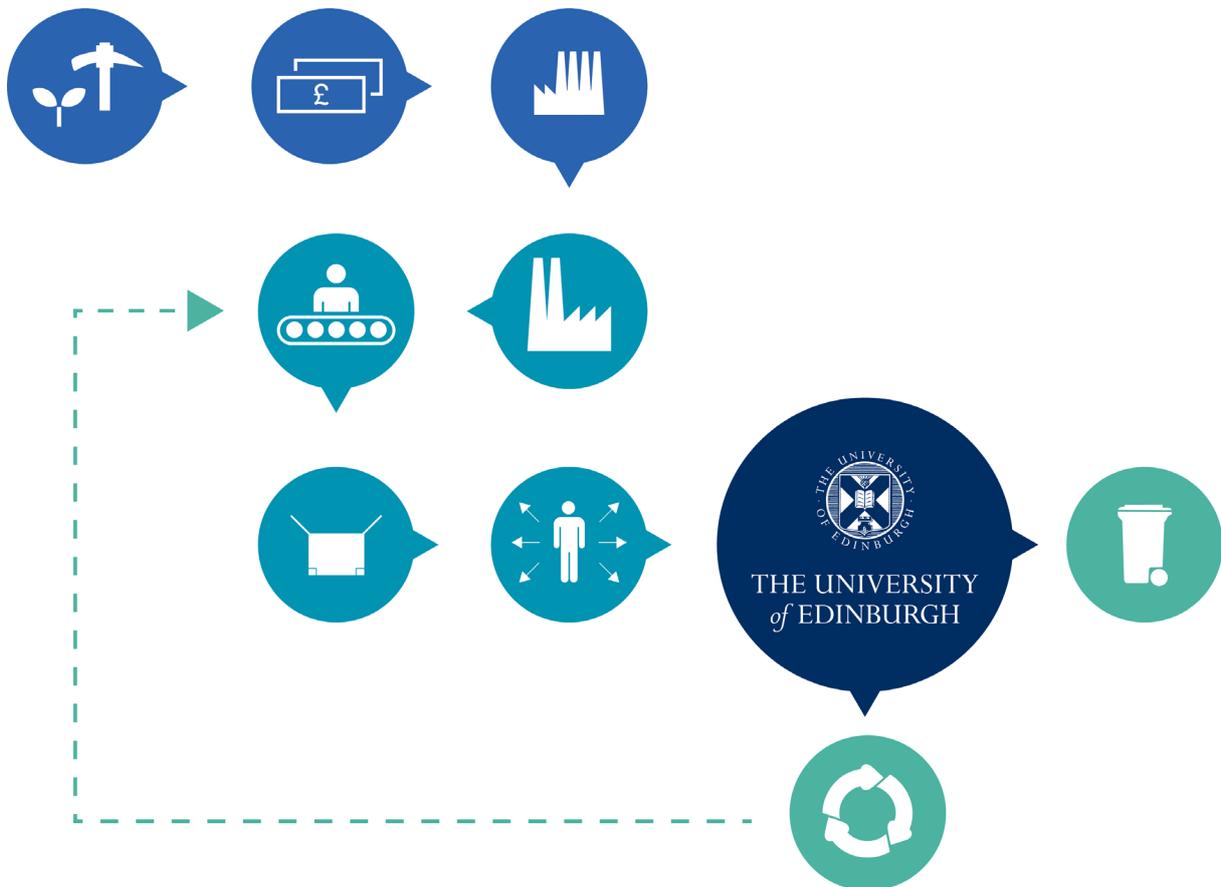
5. Training and capacity building

As a place of learning, we recognise our responsibility to raise awareness of the issue of modern slavery, and to train some groups specifically on modern slavery risks and best practices. We incorporated modern slavery awareness into our 2020 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. This year, we updated the course content to include more information about how to spot the signs of exploitation and what steps should be taken if a person suspects that exploitation is taking place. 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.

In line with our ongoing commitment to Electronics Watch, a member of the University's Procurement Office attended the Electronics Watch Annual Conference in December 2020. In March 2020 this colleague co-presented a [joint webinar with Electronics Watch](#) to UK universities about the ways in which Electronics Watch affiliation supports Modern Slavery Act compliance. University staff also attended events held by the Scottish Government Human Trafficking Team in 2019/20 to learn about national efforts to combat modern slavery and provide feedback on proposed legislation.

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	2019/20 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	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	267 staff have taken in-house online training on modern slavery (to date, up to July 2020). All MCIPs professionals in the Procurement Office complete Ethical Procurement Training every year to maintain their membership. 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	39,841 (to date, up to July 2020)* *Note this number is less than previous years due to a change in the way this figure is being calculated)
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 2020/2021, in addition to continuing the work outlined above, we will focus in particular on the following:

- Develop 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.
- Review our modern slavery terms and conditions as part of a larger review of the University's terms and conditions of purchase.
- Continue to raise awareness of modern slavery amongst staff and students.
- Develop further research collaborations related to modern slavery risks and solutions.
- Due to revised strategy, further refine our supply chain modern slavery risk mapping, due diligence controls process and contract management.
- Trial the Electronics Watch contract conditions in an upcoming ICT procurement.
- Develop context-specific advice regarding taking action on modern slavery for people working in different parts of the world, to sit as part of a suite of Research Integrity resources.
- Ensure modern slavery is considered as part of a planned review of academic partnership due diligence, processes and policies.
- Organise a modern slavery training session for senior managers and Modern Slavery Working Group members.
- As part of implementing a new Core System and the creation of a new Contracts Management team within Procurement, ensure the inclusion of modern slavery KPIs and figures as part of a wider range of reportable statistics.
- Use new APUC Sustain Tool to embed supply chain management into strategic procurement where appropriate.
- Implement the new version of the Sustain Code of Conduct in University procurements.
- Continue to benchmark the University's Modern Slavery Statement against the Ethical Trading Initiative Evaluation Framework.

8. Approval and review

Date statement approved

30 November 2020

Final approval by

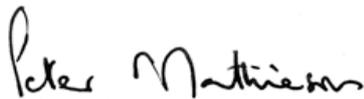
University Court

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 2021



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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