



THE UNIVERSITY *of* EDINBURGH



Modern Slavery Statement

For the period 1 August 2022 to 31 July 2023

The University of Edinburgh

Modern Slavery Statement 2022-23

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 2022 and ending 31 July 2023. It sets out the steps the University has taken across our research, teaching and operational activities in relation to slavery and human trafficking in our supply chains and within our own organisation.

1. Our commitment

The University's [Strategy 2030](#) sets out our vision to make the world a better place. A key focus of the Strategy is Social and Civic Responsibility, ensuring that our actions and activities deliver positive change locally, regionally and globally.

We recognise that modern slavery is a significant global human rights issue that includes human trafficking, sexual exploitation, forced and bonded labour, domestic servitude and some forms of child labour. Our commitment starts from protecting and respecting human rights and taking action to prevent slavery and human trafficking in all its

forms. We are committed to acting ethically and with integrity in all our relationships, and using all reasonable endeavours to take action within our direct operations and wider sphere of influence to ensure that slavery and human trafficking are not taking place. We recognise we have a responsibility to raise awareness of modern slavery by researching, teaching and engaging staff and students on this issue.

2. The University's structure and activities

The University of Edinburgh is constituted by the Universities (Scotland) Acts 1858 to 1966. The Universities (Scotland) Acts make specific provision for three major bodies in the Governance of the University: Court, Senate and General Council. The University is organised into three colleges (College of Arts, Humanities & Social Sciences, College of Medicine & Veterinary Medicine and College of Science & Engineering), a Finance Directorate and three professional services Groups (Corporate Services Group, Information Services Group and University Secretary's Group). Over the 2022-23 academic year, the University comprised roughly 16,899 staff (11,887.70 Full Time Equivalent) and around 49,740 students, with an annual turnover of £1,399 million.

The University educates students from all over the world, and seeks to attract, develop, reward and retain the best staff for a world-class teaching and research institution. Many University of Edinburgh staff work internationally and some are based, or spend a significant amount of their time, working at University facilities overseas. These international facilities include liaison offices in Chile, China, India, Singapore and the USA, and collaborative ventures (teaching, research and outreach) including in China and India.

The University carries out various key activities via subsidiary companies, thereby protecting its charitable status. Obligations between the University and each of its subsidiaries are governed by a Memoranda of Understanding (MoU). A complete list of the University Subsidiary undertakings, which comprise companies, charities and partnerships registered in Scotland, can be found [online](#). Subsidiary companies are not required to publish Modern Slavery Statements unless they independently fulfil the UK Governments requirements. In July 2023, it was decided that, in order to support the [University's Anti-Slavery Policy \(2021\)](#), the University's Modern Slavery Statement, going forward from 2022-23, should explicitly include Subsidiaries as part of a group statement.

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. 33% of our spend is through frameworks established by collaborative consortia, particularly the Advanced Procurement for Universities and Colleges (APUC), Crown Commercial Services (CCS), Scottish Procurement (Scottish Government), and The University Caterers Organisation (TUCO).

Our procurement spend over the 2022-23 financial year was £286.8 million, with thousands of unique suppliers. We awarded 154 regulated public procurement contracts during this period for a value of £109.2 million, with 104 of these won by SME contractors. £95.7 million of this spend came through collaborative contracts of which £44.4 million of spend was on **Category A** contracts (available to all public bodies e.g. Scottish Government, Crown Commercial Services) - accounting for 15% of total spend, and £51.3 million of spend was on **Category B** contracts (available to public bodies within a specific sector – e.g. APUC, Scotland Excel) - accounting for 18% of total spend.



3. Assessing modern slavery risks in our supply chains and other areas

We recognise there are risks of modern slavery in the supply chains for all types of goods and services. By its very nature, modern slavery is hard to detect and is often hidden within seemingly legitimate industries.

Sustainability tools and guidance, which support Scotland's National Performance Framework outcomes, is embedded into our procurement process for regulated procurements and the adoption of framework agreements. The University is exploring the development and use of different industry-leading sustainability tools.

We conduct research and use a number of tools to assess sustainability risks, including modern slavery, across all procurement categories (Laboratories, Estates, Information Service, and Professional Campus Services). [Briefing papers](#) and action plans have been produced that summarise the category risks and opportunities in key areas (electronics, catering supplies and services, laboratories, and travel). These briefing papers are due to be redeveloped alongside the wider sector in 2023-24.

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 the 2022 academic report: [Driving Force](#). In early 2022 there were alerts to potential risk of modern slavery within the manufacturing supply chain of consumer vehicles – with particular reference to Human Rights violations taking place in the Uyghur region of China. Following the report, the University has evaluated the risk of such instances occurring within our procurement.

While the severity of the risk is considered to be moderate, the likelihood of such a risk occurring at the University is considered to be high due to the range of vehicle manufacturers that are noted as utilising suppliers in this region, as well as the materials which it was not possible to track through the report. The University is currently evaluating steps to reduce the likelihood of such instances occurring.

Other high-risk areas include imported goods, including food such as fish and seafood from Asia, cocoa farmed in parts of West Africa, sugar cane grown in the Caribbean, rice produced in India and Myanmar, construction materials including stone from India and China, garments produced in South America and Asia, electronics manufactured in Asia and other laboratory equipment. In the UK, relevant sectors that have a higher risk of modern slavery include hospitality, cleaning services, construction sites, farms and food processing facilities. The Covid-19 pandemic continues to increase the vulnerability of many groups to human trafficking and modern slavery; particularly women and migrant workers. The subsequent economic downturn, increased cost of living, travel restrictions and reduced scrutiny of working conditions has left many workers stranded without income or at risk of exploitation from employers.

4. Our policies and practices for the prevention and mitigation of human trafficking and modern slavery, including steps taken in 2022-23

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 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 in accordance with the Anti-Slavery policy (2021) and appropriate disciplinary action would be taken against any member of staff found to have acted in breach of any relevant University policies. No instances, or potential instances, of on-site modern slavery were raised in 2022-23.



Purchasing and supply chains

The University's [Procurement Strategy 2021-26](#) outlines our ethical procurement approach and sets out our principles and practices for the acquisition of goods, services and building works. Within this strategy, modern slavery is noted as one of the key sustainability areas for our contract clauses. 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 \(2004, updated in 2013, 2017 and 2020\)](#) and guidance on addressing 'fair work' practices in procurements. In 2021 we published an [Anti-Slavery Policy](#) to specify our commitments and responsibilities in this area, and details the process for reporting instances, or potential instances, of modern slavery at the University.

We have integrated modern slavery into the University's terms and conditions for purchase contracts. Suppliers 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
- 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 [Procurement Policy](#) to ensure that staff only make purchases, other than small expenses, using established processes. This is being monitored by finance transaction teams with stricter guidelines coming into force in October 2023 to ensure compliance with this policy. New suppliers to the University are managed centrally by the procurement department, in alignment with the University's Procurement Policy.

This allows for a consistent approach and ensures that all suppliers have completed 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 \(2021b\)](#). 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. All suppliers of regulated contracted are asked to sign the APUC code of conduct, and all suppliers added to the University's finance system are required to confirm that they comply with the Modern Slavery Act.

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. For example, within the Laboratories category, first and second tier supply chains had been disclosed for gloves supply chains of suppliers to the APUC framework agreement for laboratory plastic-ware, glassware and sundries. We used 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. In 2022 the University received a 2-star award as part of the University and Colleges Award. In 2022-23, the University agreed to broadening the accepted sustainability certifications when purchasing ethical products to include: Rainforest Alliance, Fair for Life, Global Organic Textile Standards (GOTS) and Fair Wear. Since receiving this award, the University has been working towards a resubmission of this award which is due in early 2024. Our cafes stock a range of fairly-traded products including rice, chocolate, coffee, sugar, bananas and tea while the University visitor centre also expanded its range of FairWear and Global Organic Textile Standard (GOTS) certified products.

The uncertainty around certain supply chains due to climate change, wars, or other global events has led to an intense upsurge in global demand for certain products. This is acutely visible in the supply of food, but also of other common goods such as clothing and lab consumables. In 2022-23, the University continued to work internally and with its partners to address some of these risks, and acknowledge that, in some regions in which our supply chains operate, these supply chain issues will remain for some time to come.

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 bought by the University 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.

The University had no local (category C) contracts for large ICT hardware or infrastructure projects in 2022-23. However, the University has called-off from APUC and Crown Commercial Services (CCS) framework agreements, which have included conditions and provisions at framework-level.

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



Farms and food processing facilities



Construction sites



Cleaning services



Electronics manufacturing and e-waste disposal



Cotton growing



Medical instruments manufacture



Rice



Sugar cane



Cocoa



Construction materials (e.g. stone)



Conflict minerals



Fishing



Garment manufacture



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, the University established an Income Due Diligence Group (IDDG). The purpose of this group is 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.

These funding streams include, but is not limited to, philanthropic and contractual business, industrial and international government sources.

The University screens all potential income in excess of £10,000 for a number of ethical and reputational issues, 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. No modern slavery concerns were raised through the IDDG in 2022-23.

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.

PRI carries out an assessment of our integration of the principles into our fund management. Due to an upgrade with the PRI reporting system, the most recent assessment results (2021) are not available. The 2022 assessment was submitted by the University in September 2023, with results due later in the 2023-24 financial year. In the most recent assessment the University (2020) received an A rating.



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. In May 2023, academics from the Centre for Statistics (School of Mathematics) and the Edinburgh Futures Institute (EFI) hosted an event to promote collaboration in the area of estimating hidden population sizes, with one of the potential applications of this statistical modelling being to estimating the population size of modern slavery victims. Discussions took place with the University of Sydney in early 2023 to establish potential collaborate opportunities. While no further action has taken place to date, the University intends to restart these discussions in 2023-24.

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 2023, a group of students took part in the Case Studies for Sustainable Development (CSSD) course, examining how the University could improve the impact of Fairtrade at the University. As in previous years, the University's Department for Social Responsibility and Sustainability offered to host a student from the School of Law's LLM in Human Rights for a work-based placement over the 2023 summer. Due to the large number of projects proposed, this offer was not taken up in 2022-23.

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 and the Modern Slavery Awareness course is part of the list of Research Integrity trainings for University researchers. Awareness of modern slavery risks has also been incorporated into Ethical Research Partnerships guidance for staff and students working with organisations and institutions overseas. The Academic Collaboration Agreement Templates used by Edinburgh Global and the Edinburgh Research Office incorporate a clause seeking partners to comply with all applicable laws and regulation relating to anti-slavery and human trafficking, and not to engage in any activity, practice or conduct which would constitute an offence under the Modern Slavery Act.

Annual [Research Ethics and Integrity Reports](#) provide a snapshot of the work being carried out across the University to put our institutional commitment to strengthening the integrity of our research into practice.



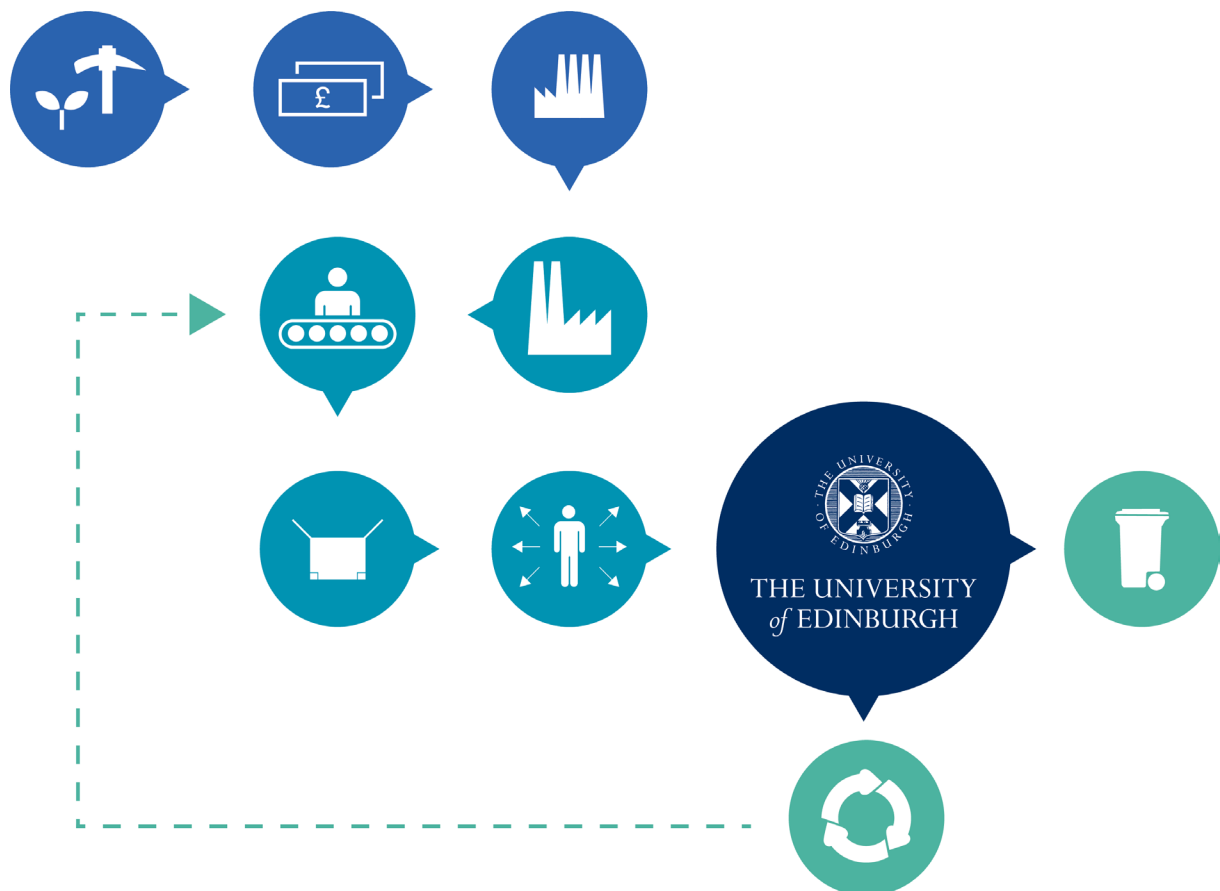
5. Training and capacity building

As a place of learning, 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 2023 Fairtrade Fortnight campaign, with representatives from Tony's Chocolonely presented to staff and students at Kings Buildings and the Central Campus to discuss the risk of modern slavery within the chocolate industry, and highlight their mission to make 100% slave free chocolate the norm.

The Modern Slavery Awareness course has been redesigned and will be released in November 2023. The course aims to raise awareness of where there are risks of Modern Slavery at the University, and actions to take if a member of staff, student, or visitor suspects something isn't right. This course is mandatory for all staff members with authority to approve financial transactions and optional for all other staff and students. 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 addition, we continue to link to publicly available modern slavery resources and online courses [on our website](#).

We are active members of the Higher Education Procurement Authority (HEPA) and Environmental Association for Universities and Colleges (EAUC) 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	2022-23 measure
# of contracts that are issued on University standard terms and conditions that include modern slavery compliance provisions	All purchases are subject to the University's standard Terms and Conditions, unless otherwise agreed in writing by the Director of Procurement. These terms and conditions include modern slavery compliance provisions.
# 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	206 published reports, 67 in progress, 44 declined to participate (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	<p>65 staff have taken in-house online training on modern slavery between 1 August 2022 and 31 July 2023.</p> <p>As part of the Procurement department's professional development schedule, the Chartered Institute of Procurement & Supply (CIPS) Ethical Procurement Training is required to be completed annually.</p> <p>15 students have completed online training between 1 August 2022 and 31 July 2023.</p>
Reaching staff, students and the wider community: # event attendees and online page views related to modern slavery	15,567 (between 1 August 2022 and 31 July 2023)
Collaborations with others	We have collaborated with Electronics Watch, Advanced Procurement for Universities and Colleges (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 2023-24, in addition to continuing the work outlined above, we will focus in particular on the following:

Learning and Teaching

- Continue to raise awareness of modern slavery amongst staff and students
- Release updated Modern Slavery Training for staff, and raise awareness of this course
- Improve understanding of breadth of modern slavery instances within HE, and ensuring colleagues at key departments are aware of these potential instances through dedicated training sessions
- Explore opportunities to collaborate as part of the University's Strategic Partnership with the University of Sydney (Australia)

Research

- Continue to undertake research and benchmarking activities to inform our approach
- Develop cross-institutional research collaborations related to modern slavery risks and solutions, with particular reference to the opportunities available through the Strategic Partnership with the University of Sydney (Australia)

Operations

- Standardise approach to Modern Slavery within our Subsidiaries. To include monitoring and reporting as required
- Continue to integrate modern slavery due diligence as part of our contract management activities
- Raise awareness of the University's Anti-Slavery Policy (2021) amongst staff and students
- Increase use of supplier management tools to evaluate the actions of UoE suppliers in relation to modern slavery

8. Approval and review

Date statement approved

12 December 2023

Final approval by

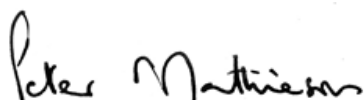
University Executive

Consultations held

In addition to the Working Group members detailed above, the statement has been reviewed by the Sustainability, Civic & Social Responsibility (SCSR) Committee, and the University Executive

Dates for review of statement

December 2024



For and on behalf the University of Edinburgh

Further information and contact

University approach to modern slavery:

www.ed.ac.uk/sustainability/programmes-and-projects/supply-chains-and-investments/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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