



THE UNIVERSITY *of* EDINBURGH



Modern Slavery Statement

2023/24

For the period 1 August 2023 to 31 July 2024

The University of Edinburgh

Modern Slavery Statement 2023/24

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 2023 and ending 31 July 2024. 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, encompassing issues such as human trafficking, sexual exploitation, forced and bonded labour, domestic servitude and certain 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 of 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), three Professional Services Groups (Corporate Services Group, Information Services Group and University Secretary's Group) and a Finance Directorate.

On 31 July 2024, the University had 18,924 staff during the 2023/24 academic year, there were 49,485 students in total. The University turnover for 2023/2024 was £1.4 billion.

The University welcomes students from around the globe and strives to attract, develop, reward and retain exceptional staff to support its world-class teaching and research mission. Many staff work internationally, with some based abroad or spending substantial time at university facilities overseas. These international locations include liaison offices in Chile, China, India, Singapore and the USA, as well as collaborative initiatives in teaching, research and outreach in China and India.

The University conducts a range of essential activities through its subsidiary companies, helping to maintain its charitable status. Agreements between the University and each subsidiary are outlined in memoranda of understandings and overseen by the University's Corporate Services Group. A comprehensive list of the University's subsidiary entities—including companies, charities, and partnerships registered in Scotland—is available online. Subsidiary companies are not obligated to publish Modern Slavery Statements unless they individually meet the UK Government's criteria. However, as of July 2023, it was determined that to better support the University's Anti-Slavery Policy (2021), the University's Modern Slavery Statement would, starting from 2022-23, explicitly incorporate subsidiaries within a consolidated group statement.

The University procures a diverse array of goods and services in line with public procurement legislation and ethical sourcing practices. These include construction services and materials, furniture and office supplies, electronics (such as computers, audio-visual equipment, and phones), food and catering products, travel services, laboratory equipment and supplies, books, printing and waste management services.

Our non-pay expenditure over the 2023/24 financial year was £405.3 million across thousands of unique suppliers. We awarded 174 regulated public procurement contracts during this period, of a value of £195.9 million. 91 of these regulated contracts were awarded to small or medium enterprises. Approximately 30% of this

expenditure was routed through agreements set up by collaborative purchasing consortia, including Advanced Procurement for Universities and Colleges (APUC), Crown Commercial Services (CCS), Scottish Procurement (Scottish Government), and The University Caterers Organisation (TUCO).

More information:

[University subsidiaries](#)

[Anti-Slavery Policy](#)

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

The University acknowledges the potential risks of modern slavery within the supply chains of various goods and services. Although the risk of modern slavery in our direct and local operations is considered low due to our robust controls and systems, we recognize that our international activities and supply chains—particularly in high-risk countries—may still carry risks.

We are fully committed to preventing modern slavery and human trafficking in our supply chains and across all areas of our operations. To address and mitigate these risks, we collaborate closely with colleagues within the University, as well as with partners across higher education and the wider public sector.

Procurement conduct research and utilise various tools to evaluate sustainability and social responsibility risks, including modern slavery, across all expenditure categories. In 2024, the Social Responsibility and Sustainability (SRS) department, in collaboration with Procurement, introduced a risk matrix tool to use in our procurement process. A new version of this tool, currently being developed by UK Universities Purchasing Consortia (UKUPC), is expected to be released by the end of 2024-25. The University is also exploring the development and use of different industry-leading sustainability tools, and we work closely with relevant organizations to address anti-corruption measures both in their procurement processes and within our own.

Risk assessments guide commodity strategies. Each strategy includes a sustainability section that highlights upcoming high-priority procurements and outlines actions to mitigate risks, including those related to modern slavery.

74% of the University's spend is with suppliers managed by our Procurement Service team or collaborative agreements.

In 2021, as part of the Scottish Higher and Further Education Sector, the University partnered with EcoVadis through APUC to support supply chain due diligence efforts. EcoVadis brings a robust methodology and a global team of expert analysts, enabling comprehensive sustainability assessments across our supplier and supply chain network. Suppliers are selected and invited based on a category-specific, risk-based approach.

EcoVadis evaluates suppliers on 21 sustainability criteria across four key themes: environment, labour & human rights, ethics, and sustainable procurement. These assessments are grounded in leading standards, including GRI, UNGC, and ISO 26000, ensuring thorough supply chain due diligence. Based on assessment results, action items are created for suppliers, who receive a

scorecard highlighting strengths and areas for improvement. APUC and member institutions can review these scorecards, request corrective actions on specific areas, and track supplier responses and progress within the platform.

4. Our policies and practices for the prevention and mitigation of human trafficking and modern slavery, including steps taken in 2023/24

People working on our campuses

Our Human Resources Policies outline the workplace rights of employees at the University. We are diligent in ensuring that all new hires possess the legal right to work in the UK. When it is necessary to engage agency workers or contractors, our staff are directed to specific, reputable agencies that have undergone the University's thorough procurement process and meet our established selection criteria regarding their employment policies and practices. For instance, agencies are required to disclose their subcontractors and promote fair work practices as appropriate. The University is accredited by the Living Wage Foundation, ensuring that all employees receive a real living wage. Non-University contracted workers who regularly work on-site at the University are also expected to be compensated at the UK living wage, as defined by the Living Wage Foundation. Additionally, the University assesses suppliers' adherence to Fair Work Practices, including compliance with the Living Wage, in accordance with statutory guidance.

The University complies with The Public Interest Disclosure Act 1998 and has established its own Whistleblowing Code of Practice to address concerns related to potential corruption, fraud and other illegal activities within the institution. In the event that modern slavery is suspected on-site, a thorough investigation would be conducted in accordance with the Anti-Slavery Policy (2021), and appropriate disciplinary measures would be enforced against any staff member found to have violated relevant University policies. No cases or potential cases of on-site modern slavery were reported in 2023/24.

More information:

[Whistleblowing Policy](#)

[Public Interest Disclosure Act 1998](#)

[Living Wage Foundation](#)

[Human Resources Policies](#)



Purchasing and supply chains

The University is committed to acquiring goods and services for use without causing harm to others, acting ethically and with integrity in all of our business relationship.

Policies and Procedures

The University's Procurement Strategy 2030 outlines principles and practices for acquiring goods, services, and building works., with one of the key strategic focuses on the wellbeing of those within its supply chain. The University also has an underpinning Procurement Policy in place, ensuring that staff only make purchases using established procurement processes.

Other relevant policies include our Conflict Minerals Policy (2016), Palm Oil Policy (2019), Fair Trade Policy (2004, updated in 2013, 2017, 2020 and 2024) and guidance on addressing 'fair work' practices in our procurement activities. 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 also 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, mandatory exclusion grounds and 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 there are concerns about the reliability of information provided.

New suppliers of the University are managed by Procurement, in accordance with the University's Procurement Policy. This approach ensures consistency and confirms that all suppliers have completed a self-declaration form to verify their compliance with the Modern Slavery Act.

The University remains deeply committed to promoting fair trade. This commitment, which has been recognized on multiple occasions, and most recently led to a 1-star award from the University and Colleges Fair Trade Award in June 2024.

The University has taken proactive steps to broaden the scope of accepted sustainability certifications for ethically sourced products. As of 2022/23, our procurement policies now recognize additional certifications, including Rainforest Alliance, Fair for Life, Global Organic Textile Standards (GOTS), and Fair Wear, reflecting our dedication to inclusivity and accountability in ethical sourcing. I

n addition, our cafés stock a variety of fairly traded items, such as rice, chocolate, coffee, sugar, bananas and tea and the University visitor centre has broadened its selection of Fair Wear and GOTS-certified products, supporting sustainable fashion choices for our community and visitors alike. Our commitment to high ethical standards and sustainable practices continues to evolve. This ambition underscores our dedication to continuous improvement, even as standards become more rigorous, as we seek to enhance our ethical procurement practices.

In order to ensure the University uses the most appropriate tools to deliver change, a review of the Fairtrade Award is scheduled to be undertaken by the University in 2024-25.

More information:

[Fair Work](#)

[Policy Directory](#)

[Procurement Strategy 2030](#)

Fair Trade

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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.



Prioritised procurement categories

- Estates and construction
- Laboratories
- Travel
- Food and catering
- Information and Communication Technology

Base map: PeterHermesFurian via Getty Images

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Sector collaboration

A significant amount of University expenditure is directed through agreements established by collaborative purchasing consortia, including Advanced Procurement for Universities and Colleges (APUC). A core element of APUC's sustainability agenda is to promote transparency in the responsible business practices of our suppliers and their subcontractors.

The University has contributed to and adopted the sector's 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. All suppliers of regulated contracted are asked to sign the 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.

When risks related to existing contracts are identified, we engage directly with suppliers to address human rights concerns or collaborate with the higher education sector. For example, within the Information Services category, APUC has gathered IT hardware data from across the sector and shared it with Electronics Watch to facilitate targeted worker monitoring. Efforts are underway to identify supply chains for specific models. Additionally, Electronics Watch's specific terms and conditions have been incorporated into the IT frameworks awarded by university purchasing consortia, from which the University actively procures.

The University also gains access to various other important IT collaborative agreements awarded by higher education procurement consortia, the Scottish Government, and Crown Commercial Services. APUC collaborates with partner organizations to ensure that appropriate monitoring conditions are included. Relevant Police Scotland documents concerning SOC and Human Trafficking have been integrated into all APUC ITTs where appropriate.

APUC has also employed Section 1 of its Supply Chain Management tool to verify that its contractors (of which the University has access to via frameworks) have published Modern Slavery statements in compliance with the Modern Slavery Act 2015.

Contract management

In September 2023, the University restructured its Contract and Supplier Management team, aligning resources by

procurement category to enhance expertise and maximize value in supplier relationships. This new model enables a stronger focus on managing high-risk, high-value contracts, ensuring more effective practical delivery and oversight. Modern slavery risks in these contracts are actively addressed through proactive supplier engagement, ensuring alignment with the University's ethical priorities.

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 was in 2023, with the University performing above average in three out of four modules. The full scorecard can be found [here](#).

The University is currently reviewing our Responsible Investment policy for agreement in 2025. The University undertook a consultation with staff and students on the policy during 2024-25 which attracted over 1900 responses.

More information:

[PRI scores](#)

[United Nations Principles of Responsible Investment](#)

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 2023/24.

More information:

[Income Due Diligence Group](#)

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.

Our academic colleagues 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.

Our research contracts reflect the University's modern slavery approach. The University is required to confirm equivalence with funder's commitments, which are flowed down to our collaborators. The Modern Slavery Awareness course is also part of the list of Research Integrity training 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.

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.

More information:

[Annual Research Ethics and Integrity Reports](#)

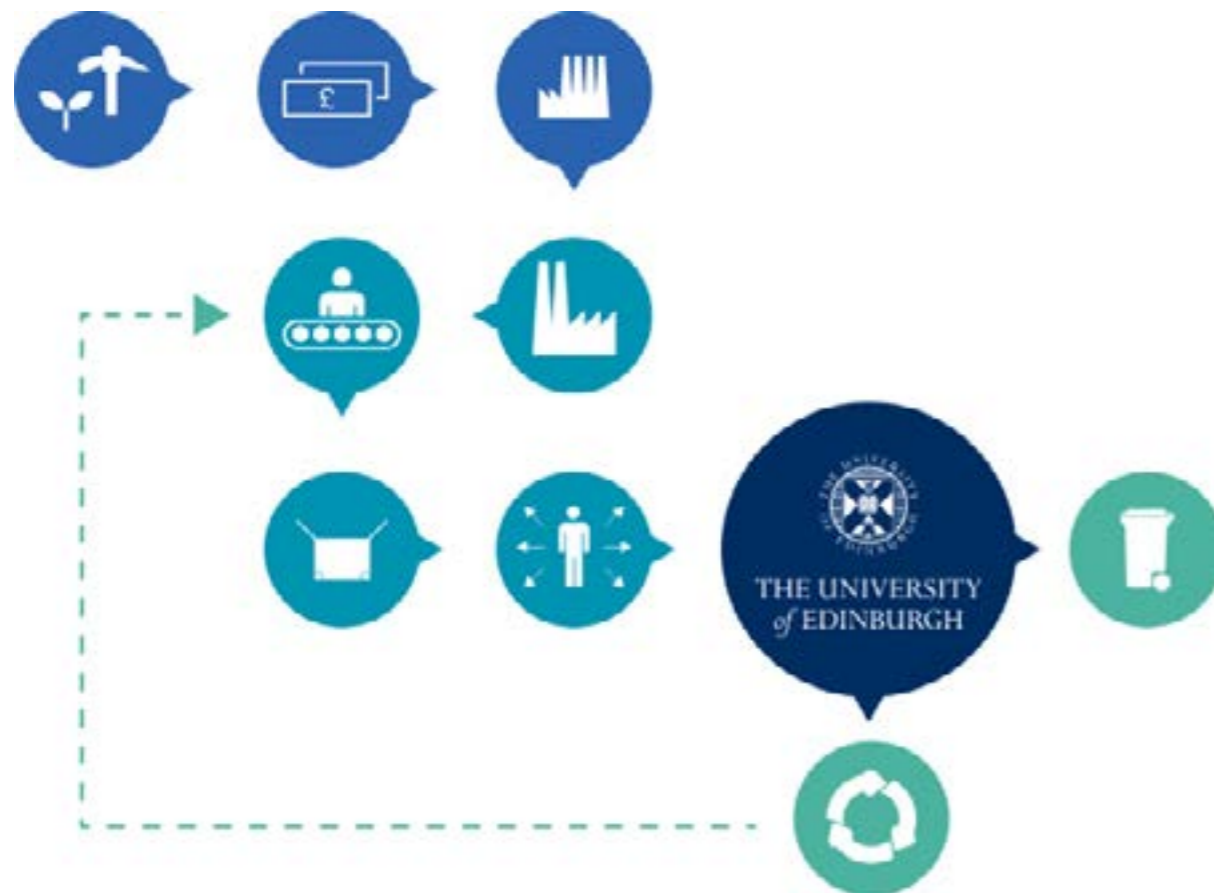
5. Training and capacity building

In November 2023, the University launched a redesigned Modern Slavery Awareness course aimed at strengthening awareness and response to modern slavery risks within the University. This updated course, now mandatory for all those with authority for financial transactions, equips staff with the knowledge to recognize potential indicators of modern slavery and outlines actions to take if it is suspected that something isn't right. While the training is optional for other staff and students, it remains widely accessible, underscoring our commitment to a well-informed community. Additionally, the University's website offers resources and online courses on modern slavery, extending awareness and action beyond this training.

Procurement staff must participate in training on human rights issues. This includes an annual ethics refresher course, which covers human rights due diligence. During the reporting year, several team members also took part

in a webinar hosted by the City of Edinburgh Council in June, where the National Crime Agency provided insights on modern slavery.

We are also active members in key collaborative groups, including the Higher Education Procurement Authority (HEPA) and the Environmental Association for Universities and Colleges (EAUC) Responsible Procurement Group (RPG). Through the RPG, the University shares best practices and addresses modern slavery risks with peers, fostering a collective approach to responsible procurement within the higher education 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	2023/24 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	All suppliers engaged indirectly through new terms and conditions and self-declaration requirement.
# suppliers providing information on modern slavery efforts on EcoVadis supplier database	255 published reports, 86 in progress, 76 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)	72 staff have taken in-house online training on modern slavery between 1 August 2023 and 31 July 2024. 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.
Reaching staff, students and the wider community: # event attendees and online page views related to modern slavery	5,805 (1 August 1 2023- 31 July 2024)

7. Action plan for next financial year

In 2024-25, in addition to continuing the work outlined above, we will focus in particular on the following:

Learning and Teaching

- Enhance awareness of modern slavery among staff and students by improving the promotion of online training through communication channels and integrating it with broader procurement awareness initiatives.
- 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.

Research

- Continue to undertake research and benchmarking activities to inform our approach.

Operations

- Continue to raise awareness of the University's Anti-Slavery Policy (2021) amongst staff and students.

8. Approval and review

Date statement approved

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Final approval by

University Executive

Peter Mathieson, Principal and Vice-Chancellor, the University of Edinburgh

Signed by



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 2025

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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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