



## Modern Slavery Statement

For the period 1st August 2024 to 31st July 2025

At the University of Edinburgh, we are committed to upholding and promoting human rights, maintaining a zero-tolerance approach to all forms of slavery and human trafficking. This statement is issued in accordance with 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 2024 and ending 31 July 2025. It outlines 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.

## Our commitment

The University's Strategy 2030 sets out our vision to make the world a better place. A central pillar of this strategy is Social and Civic responsibility, which commits us to ensure our actions and activities create positive change locally, regionally and globally.

We acknowledge that **modern slavery** is a serious global human rights concern, encompassing human trafficking, sexual exploitation, forced and bonded labour, domestic servitude, and certain forms of child labour. Our commitment begins with protecting and respecting human rights and taking proactive steps to prevent slavery and human trafficking in all their forms.

We are dedicated to acting ethically and with integrity in all our relationships, and to taking all reasonable measures both within our direct operations and across our wider sphere of influence, to ensure that slavery and human trafficking do not occur. We also recognise our responsibility to raise awareness of modern slavery through our research, teaching, and engagement with staff and students.

## 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 2025, the University had 18,043<sup>1</sup> staff and there were 49,485 students in total. The University turnover for 2024/2025 was £1.48 billion.

To support the University's world class teaching and research mission, we welcome students from around the globe and strive to attract, develop, reward and retain exceptional staff. The University efforts influence and effort extends internationally, with some staff based abroad or situated for a period of time at university facilities overseas. This international reach includes 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 undertakes a range of essential activities through its subsidiary entities, which support the delivery of its strategic objectives while maintaining its charitable status. The relationship between the University and each subsidiary is governed by formal Memoranda of Understanding, overseen by the University's Corporate Services Group. A comprehensive list of the University's subsidiaries including companies, charities, and partnerships registered in Scotland is publicly available [online](#). While subsidiary companies are not individually required to publish Modern Slavery Statements unless they meet the UK Government's reporting criteria, since July 2023 the University has consolidated its Modern Slavery Statement to include all subsidiary entities. This approach strengthens the University's commitment to ethical governance and aligns with the [University's Anti-Slavery Policy \(2021\)](#).

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 2024/25 financial year was £375 million across thousands of unique suppliers. Approximately 68% of the University's spend is with suppliers managed by our Procurement Service team or collaborative agreements.

We awarded 206 regulated public procurement contracts during this period, of a value of £187 million. 129 of these regulated contracts were awarded to small or medium enterprises. Approximately 33% of procurement 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).

## Assessing modern slavery risks in our supply chains and other areas

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<sup>1</sup> This figure is the number of active staff as of 31<sup>st</sup> July 2025: includes Guaranteed Hours, Casual & Contingency Staff, as well as Staff in Non UoE Entities (Edinburgh Press & Edinburgh Innovations)



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 recognise that our international activities and supply chain (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.

### **UKUPC Responsible Procurement Mapping Tool**

The Procurement Department, where proportionate will conduct market research and utilise various tools to evaluate sustainability and social responsibility risks, including modern slavery, across all expenditure categories. One of the tools currently utilised, developed by UK Universities Purchasing Consortia (UKUPC), is the UKUPC Responsible Procurement Mapping Tool.

This tool is used to highlight areas of risk and opportunity by commodity, aligned to the SUSTAIN code of conduct. The tool assesses specific commodity markets for their environmental sustainability, social compliance, working environment & terms and ethical compliance & economic development. Within social compliance, the tool provides a score for the risk of Modern Slavery. Thereby providing the procurement lead with an overview of the market that can be beneficial when strategizing a contract and tailoring it with consideration to its risks and potential for wider impact.

### **EcoVadis**

Since 2021, the University has partnered with [EcoVadis](#) through APUC and the wider Scottish Higher and Further Education Sector to support supply chain due diligence efforts. EcoVadis provides 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 Global Reporting Initiative (GRI), UN Global Compact (UNGC), and International Organisation for Standardisation (ISO) 26000, to ensure comprehensive supply chain due diligence. Following each assessment, suppliers receive a detailed scorecard outlining their strengths and areas for improvement and actions. APUC and member institutions can review these scorecards, request corrective actions on specific areas, and track supplier responses and progress within the platform.

67 of the University's regulated level spend suppliers are registered on EcoVadis with 5 suppliers being invited to EcoVadis in 24/25.

### **Section One Tool**



Through APUC, the University also has access to Responsible Procurement Section One Tool, which is a supplier self-assessment on company information, supply chain, carbon reduction and fair work. This assessment is available through the University's contract register platform Hunter. When suppliers have completed the questionnaire, the University can easily obtain information on the suppliers ethical supply chain practices, what efforts they're taking to reduce carbon and what fair work practices they are implementing.

The University will be working in the next year to increase its use of Section One and encourage the University supply chain to complete the questionnaire, to be used as a useful market information tool for individual contracts and assessment of the University's supply chain.

## Our policies and practices for the prevention and mitigation of human trafficking and modern slavery, including steps taken in 2024/25

### People working on our campuses

Our employees workplace rights at the University are outlined in our [Human Resources Policies](#). 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. As part of the recruitment process, 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](#). At a supply chain level, 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.

### Supply Chains



The University is committed to sourcing goods and services responsibly, ensuring no harm to others and maintaining integrity and ethical conduct in all business relationships.

In September 2023, the University restructured its Contract and Supplier Management (CSM) 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. The CSM team respond to red flags that are reported throughout the contract, undertake appropriate investigations and develop mitigation plans.

For more sustainable supply chains, the University, SRS and APUC are currently looking at ways to improve the process of inviting the suppliers to complete and update their information on EcoVadis. We are aiming to increase on the number of contracted suppliers invited to and registered on EcoVadis in the next academic year, to enhance available data essential for contract management and supply chain monitoring.

### 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 contracts 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.

If risks related to existing contracts are identified, the procurement team engage directly with suppliers to address concern for human rights or collaborate with the higher education sector to share mitigation efforts.

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.

### 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.

Through these actions, the University strengthens its role as a leader in ethical sourcing and sustainable supply chains, ensuring that our procurement practices align with our mission to deliver positive change for our communities, ensuring we have a sustained focus on the wellbeing of those that work in our supply chains.

We are also active membership 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.

### 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 being the wellbeing of those that work within our supply chain. The University's Procurement Policy (updated this year) additionally ensures that staff only make purchases using our established procurement processes. The refreshed policy did not introduce any new controls or expectations but offered clearer guidance and clarification than the previous iteration. The main updates are:

- Inclusion of greater detail and guidance on regulated and unregulated procurement processes including activities, roles, approvals, delegations and exceptions within the Procurement department itself;
- Updated values for regulated procurement thresholds (note these are subject to change every two years);
- Confirmation of the process of agreeing any variations of University's standard terms and conditions

Other relevant policies include our [Conflict Minerals Policy \(2023\)](#), [Palm Oil Policy](#), [Fair Trade Policy](#) [Fair Trade Practices](#) 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 & Conditions \(2025\)](#) 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.

## **Fair Trade**

The University remains deeply committed to promoting fair trade. This commitment, which has been recognised on multiple occasions, and most recently led to a 1-star award from the University and Colleges Fair Trade Award in June 2024. Our current accreditation is due to run out in 2026. In 2024-25, the University took the decision to discontinue participation in the Universities and Colleges Fairtrade Awards. Instead, the University will continue actions that promote fair trade as part of business as usual. We made this choice because we feel the Award process is no longer driving change for us.

The University has taken proactive steps to broaden the scope of accepted sustainability certifications for ethically sourced products. Our procurement policies recognise 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.

In addition, our cafés stock a variety of fairly traded items, such as rice, chocolate, coffee, sugar, soft drinks, bananas and tea. 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.

## Income, including fundraising

The University receives support and 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.

As part of its income due diligence oversight and risk management and mitigation processes, the University requires that potential income over £10,000 is screened for a number of ethical and reputational issues, including any potential connection to modern slavery. Any issues are reviewed by relevant Schools and professional services, and where due diligence checks indicate significant risks or concerns, these are escalated to the University's Income Due Diligence Group (IDDG) for review. The IDDG considers and advises on the landscape of ethical considerations around acceptance of income sources and purposes related to philanthropic and contractual business, industrial and international government funding, including whether these are consistent with the University's values and mission.

More information: [Income Due Diligence Group](#)

## Investments

During the year, the University approved a new [Responsible Investment Policy Statement](#) which sets out our comprehensive approach to responsible investment. The new policy commits to the establishment of a responsible investment advisory group. The new group will consider further ways to integrate human rights into the University's investment activities and will be established later in 2025. We will update the Responsible Investment policy again in 2026-27 to take account of any changes resulting from the group's work<sup>2</sup>.

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.

## Research, teaching and partnerships

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<sup>2</sup> More information on the University's responsible investment can be found:

<https://sustainability.ed.ac.uk/sustainability-in-operations-and-estates/responsible-investment>





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. Following the event there are pending plans for some of the attendees to work with [Childlight](#), the Global Child Safety Institute which uses the power of data to drive sustainable, co-ordinated action to safeguard children across the world. The University's involvement with Childlight includes:

- Sharing of course materials for training
- Statistical support, including work on the "Index report on child sexual exploitation and abuse (CSEA)"
- University academics becoming a member of the Childlight Ethics Committee to review research proposals that have data aspects
- Ongoing involvement with projects using Education and Child Health Insights from Linked Data (ECHILD- a national data resource linking together data from hospitals, schools and social care services for children in England) <sup>3</sup>administrative data to look at sexual abuse and educational outcomes in England.

The University's approach to modern slavery is embedded within its research contracts. All research funders and collaborating partners must demonstrate alignment with the University's ethical standards. Staff within the Edinburgh Research Office (ERO) have received briefings on modern slavery risks, and the Modern Slavery Awareness course is included among the Research Integrity training options available to University researchers. Guidance on Ethical Research Partnerships also highlights modern slavery risks for staff and students engaging with organisations and institutions overseas. In addition, the Academic Collaboration Agreement Templates used by both the Edinburgh Global Department and the Edinburgh Research Office require partners to comply with all relevant anti-slavery and human trafficking laws and regulations, and to refrain from any activities or practices that could 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

### **Training and capacity building**

The University continues to promote its internal Modern Slavery Awareness course aimed at strengthening understanding and response to modern slavery risks within the University. This course is now mandatory for all those with authority for financial transactions, prepares staff with the knowledge to recognise potential indicators of modern slavery and outlines actions to take if it is suspected within the organisation. While the training is optional for other staff and students, it is available to all,

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<sup>3</sup> For more information: <https://www.echild.ac.uk/>



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.

Modern Slavery Training is available for all staff at the University which covers modern slavery risks and best practice, delivered online or via face to face courses. Of which, 17 staff have undertaken in house online training between 1<sup>st</sup> August 2024 and 31<sup>st</sup> July 2025.

As part of the Procurement department's professional development schedule, members of the Chartered Institute of Procurement & Supply (CIPS) can complete Ethical Procurement Training annually.

Procurement staff must participate in training on human rights issues. This includes an annual ethics refresher course, which covers human rights due diligence.

These initiatives reflect the University's dedication to ethical standards, human rights, and collaborative solutions, ensuring that modern slavery awareness and prevention remain at the forefront of our institutional priorities.

### Key Performance Indicators

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

Key Performance Indicator	2024/25 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 reviewed and agreed by 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 through EcoVadis supplier database	309 published reports, 104 in progress, 84 declined in total (across the sector)  67 University of Edinburgh suppliers registered on EcoVadis.  The aim is to increase number of suppliers invited and registered to enhance the EcoVadis supplier database.



# 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)	17 staff have taken in-house online training on modern slavery between 1 August 2024 and 31 July 2025.  As part of Procurement's professional development schedule, the Chartered Institute of Procurement & Supply (CIPS) Ethical Procurement Training is encouraged to be completed annually.
Reaching staff, students and the wider community: online page views related to modern slavery	8,566 (August 1 2023- 31 July 2025)

#### Action plan for next financial year

In 2025-26, in addition to continuing the work outlined above, we will focus in particular on the following:

#### **Learning and Teaching**

- Continue to 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, this will include a review of the Joint Committee on Human Rights Forced Labour in UK Supply Chain Report in FY25/25 to agree on any relevant actions for University of Edinburgh Procurement<sup>4</sup>

#### Operations

- Continue to raise awareness of the University's Anti-Slavery Policy (2021) amongst staff and students.
- Strengthen the integration of modern slavery due diligence as part of our contract management activities, in particular utilising the UKUPC Responsible Procurement Mapping tool when strategizing a contract and tailoring it with consideration to its risks and potential for wider impact.
- Increase the use of our supplier management tools to evaluate the actions of suppliers in relation to modern slavery, including the increased use of Section One with a focus on inviting suppliers to complete the questionnaire to establish more widespread and accurate data that can be utilised in contract strategies and contract management. Additionally, to increase the number of suppliers registering and obtaining accreditations on EcoVadis for assessing the sustainability of the University's supply chain.

#### Approval and review

Date statement approved	9 December 2025
Final approval by	University Executive
Consultations held	The statement has been reviewed by the members of the Social and Civic Responsibility Committee and the University Executive.
Dates for review of statement	December 2026

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<sup>4</sup> <https://publications.parliament.uk/pa/jt5901/jtselect/jtrights/633/report.html>