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Modern Slavery Governance in Universities: Beyond Compliance

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Modern Slavery Governance in Universities: Beyond Compliance

Abstract

This study examines how universities address modern slavery within their governance structures and practices, with reference to the UK Modern Slavery Act 2015. The study develops and applies the Modern Slavery Reflexive Assessment Scale, a sixty-item instrument grounded in the Pluralistic Framework for the Study of Economic Exploitation. Data were collected in 2025 from eighteen UK universities through structured assessments completed by institutional officers. The findings indicate that longer-standing institutional engagement and stronger sustainability performance are consistently associated with higher levels of reflexive practice, suggesting that continuity and embedded governance cultures support movement beyond symbolic compliance. Progress is most evident in policy development, governance arrangements, and sustainability integration. Engagement with intersectional and decolonial perspectives is limited, while survivor-centred practices, participatory monitoring, iterative learning, and systematic impact evaluation remain underdeveloped. The findings also provide the basis for developing the Reflexive Anti-Slavery Governance Model for Higher Education.

JEL classification

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Keywords

modern slavery, higher education governance, universities, UK Modern Slavery Act 2015, sustainability and universities, intersectional and decolonial perspectives; economic exploitation

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1. Introduction

A defining characteristic of modern slavery is economic exploitation (Drydakis, 2023). The International Labour Organization estimates that around 27.6 million people are subjected to exploitative conditions associated with modern slavery and forced labour (International Labour Organization, 2022). Such practices are embedded in global supply chains that provide everyday goods and services. Although slavery has been legally abolished, it persists because exploitative structures remain deeply rooted in systems of production and exchange, stripping individuals of autonomy and dignity while enabling value extraction under coercive and precarious conditions (Drydakis and Martell, 2026).

Modern slavery is characterised by coercion, control, human trafficking, debt bondage and compromised consent (Ishaya et al., 2024; Pinnington et al., 2023). While exploiters rarely claim legal ownership, they achieve similar outcomes by withholding wages, confiscating passports, imposing recruitment fees or manipulating legal status. Victims often remain invisible in temporary, domestic or irregular work, unable or unwilling to seek help due to fear of retaliation, discrimination or mistrust of authorities. The persistence of modern slavery is reinforced by intersecting inequalities of race, gender and class, which generate hierarchies of vulnerability that traffickers and employers exploit for profit (Drydakis and Martell, 2026). These dynamics show that modern slavery is not a vestige of the past but a systemic feature of contemporary economies, sustained by global demand and structural inequality.

Universities represent a particularly important and underexamined context for analysing modern slavery governance. Unlike many organisations, higher education institutions operate simultaneously as large employers, global purchasers, knowledge producers, and civic actors. Their procurement activities span complex international supply chains, including construction, facilities management, information technology, laboratory equipment, and outsourced services, sectors frequently associated with elevated risks of labour exploitation (Martin-Ortega, 2017; McLaren et al., 2024). At the same time, universities are sites of knowledge production and professional training, shaping how future policymakers, managers, and practitioners understand and respond to issues of modern slavery and economic exploitation. This dual role, as both economic actors embedded in global markets and epistemic institutions with normative influence, distinguishes universities from many other organisations and makes them a critical setting for examining how responsibility for modern slavery is interpreted and operationalised in practice.

Modern slavery is increasingly examined through regulatory, compliance and disclosure frameworks, particularly in relation to the UK Modern Slavery Act 2015. While this literature has generated important insights into reporting practices and transparency, it remains limited in its theoretical grounding, often treating modern slavery as a problem of organisational compliance, instead of as a manifestation of economic exploitation embedded in structural inequalities (Han et al., 2024; Ishaya et al., 2024; Martin-Ortega, 2017). This study builds on and extends the limited scholarship on modern slavery governance and sustainability in higher education, particularly Martin-Ortega's (2017) analysis of Section

54 of the UK Modern Slavery Act 2015, which highlighted the tendency of universities to comply formally with publication requirements while providing limited substantive detail on supply chain risks or human rights due diligence.

Section 54 requires large organisations, including universities with annual turnovers above £36 million, to publish annual statements outlining the steps they are taking to identify and address risks of modern slavery in their operations and supply chains. Across sectors, research indicates that compliance has often been superficial, with statements lacking depth, systematic due diligence or evidence of institutional learning (Ishaya et al., 2024; Han et al., 2024; McLaren et al., 2024; Moussa et al., 2023; Carlea and Brewer, 2023; McGaughey et al., 2022; Flynn and Walker, 2021; Schaper and Pollach, 2021). Studies analysing Modern Slavery Statements and disclosure practices have been instrumental in documenting patterns of symbolic compliance and uneven reporting quality (Martin-Ortega, 2017; Flynn and Walker, 2021; Schaper and Pollach, 2021; Moussa et al., 2023; McGaughey et al., 2022). However, this literature has primarily focused on outcomes at the level of reporting quality, policy disclosure, and transparency, offering limited insight into how modern slavery governance is interpreted, prioritised and operationalised within universities. In particular, empirical research has rarely examined internal governance arrangements, organisational capacities, or the role of institutional actors responsible for implementation, with most studies relying on document-based analysis instead of practice-oriented evidence (McGaughey et al., 2022; Han et al., 2024; Ishaya et al., 2024). As a result, there remains a lack of theory-driven, practice-oriented tools capable of assessing how universities embed responsibility for modern slavery across governance, operations and knowledge practices. This study addresses this gap by shifting the analytical focus from disclosure outputs to lived governance practices, and by operationalising a pluralistic political economy framework of economic exploitation as a systematic institutional assessment instrument.

Addressing this gap requires a theoretical framework that moves beyond compliance-oriented and disclosure-based approaches to modern slavery governance. Existing perspectives, including corporate social responsibility, transparency regulation, and institutional theory, have been valuable in explaining reporting behaviour and regulatory responses, but they offer limited capacity to capture the structural, relational, and justice-oriented dimensions of economic exploitation (Han et al., 2024; Ishaya et al., 2024; Martin-Ortega, 2017). In particular, these approaches tend to focus on observable outputs such as policies and statements, with less attention to how responsibility is interpreted, contested and operationalised within institutional contexts. The Pluralistic Framework for the Study of Economic Exploitation (Drydakis and Martell, 2026) provides a more comprehensive analytical lens by conceptualising modern slavery as a systemic and relational phenomenon embedded in broader economic and social inequalities. Its emphasis on structural analysis, epistemic pluralism, intersectional and decolonial perspectives, normative commitments, and methodological diversity enables a more nuanced evaluation of how

institutions engage with exploitation across governance, operations, and knowledge practices. This makes it particularly suitable for developing a theory-driven assessment of universities' engagement with modern slavery.

The aim of this paper is to operationalise the Pluralistic Framework for the Study of Economic Exploitation (Drydakis and Martell, 2026) by developing and applying the Modern Slavery Reflexive Assessment Scale within the higher education sector. The framework provides a conceptual foundation grounded in interrelated principles, and its transformative potential depends on its translation into measurable indicators that enable consistent assessment across institutions. This paper responds to that need by designing a structured and well-informed instrument to evaluate universities' engagement with anti-modern slavery practices. By piloting the scale with UK universities, the paper seeks to bridge theory and practice, offering both a diagnostic tool for accountability and sector-wide learning, as well as a pathway for embedding justice-oriented approaches to modern slavery and economic exploitation in institutional and policy contexts.

The significance of this study lies in addressing the persistent gap between universities' normative commitments to tackle modern slavery and the limited mechanisms available to evaluate and embed such commitments in practice. At the same time, universities face growing expectations from governments, international organisations and civil society to demonstrate credible action aligned with the Sustainable Development Goals (SDGs), particularly poverty reduction (SDG 1), gender equality (SDG 5), decent work and economic growth (SDG 8), reduced inequalities (SDG 10), and peace, justice, and strong institutions (SDG 16). Meeting these expectations requires a framework that recognises modern slavery as a form of economic exploitation that is structurally and historically embedded, while also providing universities with tools to translate this understanding into governance, operational and accountability practices. This study responds by operationalising a pluralistic framework and introducing a structured assessment instrument tailored to the higher education sector.

A distinctive contribution of this study is its methodological focus on the officers responsible for modern slavery governance in universities. Whereas previous research has concentrated on analysing Modern Slavery Statements, assessing their content and depth, this study shifts attention to the reflections of those directly involved in designing, implementing and reporting institutional responses. This perspective is significant because statements often present a curated or symbolic account, whereas officers' reflections reveal the deliberations, constraints and priorities that shape practice behind the scenes. By capturing how officers interpret obligations, balance competing pressures and engage with principles of justice and sustainability, the study addresses a critical gap in the literature. It offers new insights into the lived governance of modern slavery, complementing disclosure-based analyses and providing a fuller understanding of the organisational dynamics that sustain or inhibit substantive engagement.

Theoretically, this study extends debates on economic exploitation and modern slavery by demonstrating how the Pluralistic Framework for the Study of Economic Exploitation (Drydakis and Martell, 2026) can be translated from a conceptual paradigm into an applied institutional context. While the framework highlights exploitation as systemic, relational and ethically urgent, this study shows how its six principles can be operationalised within higher education. In doing so, the study advances theoretical understandings of exploitation, positioning it not merely as a compliance or market-failure issue but as a central barrier to achieving equity, justice and the Sustainable Development Goals. Moreover, the study contributes to the literature by extending existing governance and disclosure approaches through a pluralistic political economy perspective, and by operationalising this perspective into a systematic assessment of institutional practice.

Methodologically, the study contributes by designing and validating the Modern Slavery Reflexive Assessment Scale, a structured sixty-item instrument that operationalises the six principles of the Pluralistic Framework for the Study of Economic Exploitation (Drydakis and Martell, 2026). Drawing on DeVellis's (2003) guidelines for scale development, the instrument introduces a multidimensional diagnostic structure, organised by the six principles and cross-cutting themes of governance, operations, evidence, participation and Sustainable Development Goals alignment. Its application to eighteen UK universities generated empirical evidence for 2025, enabling descriptive, correlational and regression analyses, and demonstrating the utility of a pluralistic paradigm for systematic measurement and comparative institutional assessment.

Practically, the study provides universities, policymakers and wider stakeholders with a novel diagnostic tool to evaluate and strengthen anti-modern slavery and exploitation practices. The scale enables institutions to benchmark performance, identify strengths and areas for improvement, and embed reflexive learning processes over time. By creating a common language for accountability and dialogue, it fosters transparency and comparability across the higher education sector while aligning institutional practices with global sustainability and social responsibility agendas. In doing so, the study illustrates how justice-oriented approaches to anti-modern slavery and exploitation can be embedded within governance and operations, thereby reducing risk, enhancing legitimacy, and contributing to long-term institutional resilience and value creation.

The study's outcomes show that universities are beginning to establish structured approaches to modern slavery, with stronger recognition of economic exploitation as a systemic issue and greater willingness to draw on diverse forms of expertise. Longer-standing commitments were associated with higher reflexive engagement, suggesting that continuity and investment over time support more embedded and strategic practices. Universities with stronger sustainability profiles were also more advanced overall, indicating that sustainability-oriented institutions are more inclined to integrate diverse knowledge, embed equity and adopt innovative tools. Progress is evident in governance, policy

development and sustainability integration, although significant gaps persist. Engagement with intersectional and decolonial perspectives remains limited, and survivor-centred practices such as safe reporting, remedy mechanisms and participatory monitoring are underdeveloped. Similarly, universities are less advanced in embedding iterative learning, piloting new interventions and evaluating impact. The results suggest incremental movement beyond compliance, though variations in depth and consistency indicate scope for further cultural and operational strengthening.

The findings highlight the importance of embedding anti-slavery strategies within the broader sustainability and social justice agendas of universities, linking action on economic exploitation to poverty reduction, gender equality, decent work and institutional accountability. Evidence that longer-standing commitments are associated with higher levels of reflexive engagement suggests that continuity and long-term investment should be prioritised over short-term compliance exercises. Institutions and policymakers should therefore focus on building durable structures, sustained leadership and resourced strategies that can evolve and deepen over time. The strong association between sustainability performance and anti-slavery engagement also highlights the value of integration. Universities that embed sustainability across governance, research and operations are more likely to adopt justice-oriented practices, epistemic openness and methodological innovation. Policy frameworks should therefore encourage alignment between sustainability and anti-slavery agendas, creating incentives for institutions to advance both together. By supporting sustained commitment, cross-cutting integration and participatory learning, universities can reduce institutional risk while enhancing accountability, legitimacy and alignment with the Sustainable Development Goals.

Building on these empirical patterns, the findings provide the basis for developing the Reflexive Anti-Slavery Governance Model for Higher Education. The model synthesises the results into five interrelated developmental dimensions: Compliance Foundation, Institutional Embedding, Epistemic and Participatory Inclusion, Reflexive Learning, and Transformative Accountability. It explains how universities' anti-slavery responses can develop beyond disclosure-led compliance towards more embedded, participatory, reflexive and justice-oriented governance. The model therefore extends the study's contribution beyond measurement by offering an interpretive framework for understanding how anti-slavery responsibility is structured, enacted and deepened within higher education institutions.

The remainder of the paper is structured as follows. Section Two reviews the literature. Section Three outlines the Pluralistic Framework for the Study of Economic Exploitation. Section Four explains the development of the Modern Slavery Reflexive Assessment Scale. Section Five describes the data collection and study variables. Section Six presents the descriptive statistics, while Section Seven reports the results of the analysis and evaluates the development of the Reflexive Anti-Slavery Governance Model for Higher Education. Section Eight discusses the findings, and the final section offers the conclusion.

2. Literature Review

This literature review situates the study within interdisciplinary research on modern slavery, economic exploitation and governance, with a particular focus on supply chains, disclosure-based regulation and institutional responses. Its purpose is threefold. First, it reviews foundational and contemporary work that conceptualises modern slavery as a systemic form of economic exploitation embedded in global production and exchange. Second, it synthesises key empirical strands examining how organisations respond through risk management, governance mechanisms and transparency regimes, particularly under the UK Modern Slavery Act 2015. Third, it assesses the limited but growing body of research on modern slavery governance in higher education. The review prioritises synthesis to identify recurring patterns, limitations, and unresolved conceptual and methodological gaps that motivate the present study.

2.a Modern Slavery as Structural Economic Exploitation

Modern slavery is widely understood as a set of exploitative labour practices characterised by coercion, control and severely constrained consent, including forced labour, debt bondage, trafficking and related abuses. Contemporary scholarship conceptualises modern slavery not as an exceptional or residual phenomenon, but as a structural feature of global supply chains shaped by outsourcing, subcontracting, migration regimes and cost pressures (Drydakis and Martell, 2026; Ishaya et al., 2024; Han et al., 2024). This literature emphasises that exploitation is sustained through asymmetries of power, information and legal protection, disproportionately affecting racialised, gendered and migrant workers. Framing modern slavery as economic exploitation foregrounds its embeddedness in ordinary production and exchange, providing the analytical foundation for examining organisational responsibility beyond criminality or reputational risk.

Literature reviews further emphasise that modern slavery in supply chains is systemic and persistent, shaped by outsourcing, globalisation and inadequate monitoring that leaves workers in developing countries particularly vulnerable (Neres et al., 2025; Ishaya et al., 2024; Han et al., 2024). It is rooted in economic exploitation, poverty, exclusion, recruitment abuses and regulatory fragility, and is intensified by cost-cutting pressures and discriminatory sourcing practices (Drydakis and Martell, 2026; Han et al., 2024; Ishaya et al., 2024). Evidence from sectors such as fast fashion and agribusiness shows that exploitative labour practices are frequently normalised as efficiency gains or rendered acceptable through compliance-oriented certification schemes that mask unequal power relations within global supply chains (Shilling et al., 2021; Stringer and Michailova, 2018).

In this context, corporate social responsibility initiatives have been widely criticised for their limited capacity to address the underlying causes of exploitation, as voluntary standards and disclosure

frameworks often substitute for enforceable regulation and structural change (Mehra and Shay, 2016; Barrientos, 2013). From a development and political economy perspective, achieving decent work requires sustained scrutiny of labour regimes and supply chain structures that continue to reflect neo-colonial patterns of extraction and dependency (Udegbumam, 2020; Frankema and Buelens, 2013; Ziltener and Künzler, 2013). Addressing forced labour, trafficking and related practices therefore requires more far-reaching transformations, including expanded social protection, reconfigured supply chains and consistent enforcement of labour and human rights standards (Drydak, 2023; Mantouvalou, 2023; Van Niekerk, 2020; Kopnina, 2016).

2.b Organisational Responses: Risk Management, Governance and Disclosure

Empirical research on organisational responses to modern slavery can be grouped into three interrelated strands. The first strand examines risk management and detection practices, highlighting reliance on supplier audits, self-assessment questionnaires and first-tier monitoring, alongside limited investment in remediation and worker-driven approaches (Han et al., 2024; Ishaya et al., 2024). Technologies such as blockchain, big data and satellite monitoring offer potential for improving transparency, although adoption remains limited and often restricted to early supply chain tiers (Han et al., 2024; Ishaya et al., 2024).

The second strand focuses on governance and disclosure mechanisms, particularly transparency legislation such as the UK Modern Slavery Act 2015. This research examines how reporting requirements shape organisational behaviour, incentives and symbolic compliance (Moussa et al., 2023; Carlea and Brewer, 2023; Flynn and Walker, 2021; Schaper and Pollach, 2021). Across this literature, a consistent finding is that organisations frequently meet formal reporting requirements while providing limited evidence of substantive due diligence, supply chain engagement or outcome evaluation. Disclosure often functions as reputational risk management, with limited evidence that it serves as a mechanism for improving labour conditions (Han et al., 2024; Ishaya et al., 2024).

The third strand examines stakeholder engagement and institutional pressures, emphasising the uneven integration of unions, non-governmental organisations and worker voice, alongside the limits of firm-led compliance (McLaren et al., 2024; McGaughey et al., 2022). Governments play a central role in shaping incentives, although enforcement remains inconsistent. Meanwhile, NGOs and unions provide expertise that is often underutilised. Across these strands, scholars converge on the need for stronger governance architectures, learning mechanisms and accountability beyond disclosure. However, they offer limited tools for assessing how such capacities operate within institutions, particularly in public and educational organisations.

2.c Transparency Regulation and the UK Modern Slavery Act 2015

A substantial body of research has examined the role of transparency legislation in shaping institutional responses. The UK Modern Slavery Act 2015 combines a criminal-law framework with a transparency mechanism requiring large organisations to publish annual statements outlining their actions (Martin-Ortega, 2017). This disclosure requirement is intended to encourage scrutiny and improved due diligence (Flynn and Walker, 2021). Empirical studies demonstrate that while awareness and reporting have increased, substantive engagement remains uneven. Schaper and Pollach (2021) show that disclosure has improved over time. However, outcome reporting and worker engagement remain limited. Flynn and Walker (2021) highlight how institutional pressures drive policy adoption, while Moussa et al. (2023) find that disclosure remains dominated by symbolic practices.

Large-scale analyses further confirm these patterns. Carlea and Brewer (2023) show improvements in disclosure volume and robustness following regulatory outreach, while Pinnington et al. (2023) highlight persistent weaknesses in supply chain mapping and due diligence. Comparative work suggests that stronger regulatory frameworks, such as the French Duty of Vigilance Law, are associated with more detailed and substantive reporting (McGaughey et al., 2022).

2.d Modern Slavery Governance in Higher Education

Research on modern slavery in higher education remains limited and is primarily focused on disclosure practices. Early work by Martin-Ortega (2017) shows that universities largely comply with reporting requirements under the UK Modern Slavery Act 2015. However, they provide limited substantive detail on supply chain risks, due diligence or remediation. Subsequent studies confirm similar patterns, with universities often relying on sustainable procurement frameworks while demonstrating limited engagement with operational practices, worker voice or outcome evaluation (McLaren et al., 2024; Han et al., 2024; Moussa et al., 2023).

Despite these contributions, higher education institutions remain underexamined as governance actors in their own right. Much of the existing literature treats universities as part of a broader category of reporting organisations, with limited attention to their distinctive institutional characteristics. This is a significant omission. Universities occupy a unique position as organisations that simultaneously function as large employers, global purchasers, knowledge producers and civic institutions. Their procurement activities span complex international supply chains, including construction, facilities management, information technology, laboratory equipment and outsourced services, many of which are associated with heightened risks of labour exploitation (Martin-Ortega, 2017; McLaren et al., 2024). At the same time, universities shape knowledge, professional norms and policy debates, influencing how modern slavery and economic exploitation are understood and addressed across sectors.

This dual role introduces specific governance challenges and responsibilities. As economic actors embedded in global markets, universities are implicated in supply chain risks similar to those faced by

large corporations. As epistemic institutions, they also hold normative and educational responsibilities, contributing to research, teaching and public engagement on exploitation and human rights. However, existing research provides limited insight into how these roles are integrated within institutional governance. In particular, there is little empirical evidence on how universities allocate responsibility internally, coordinate across departments, or translate policy commitments into operational practices.

Furthermore, the literature indicates that higher education responses remain largely procedural. Disclosure-based approaches dominate, with relatively limited emphasis on due diligence, participatory monitoring or systematic evaluation. Survivor-centred approaches, worker voice and engagement with affected communities are rarely incorporated into institutional strategies. Similarly, intersectional and decolonial perspectives are largely absent from existing assessments, reflecting a broader tendency to prioritise compliance and reputational considerations over justice-oriented engagement. These limitations suggest that current approaches provide only a partial understanding of universities' engagement with modern slavery. By focusing predominantly on formal statements and disclosure quality, existing research offers limited insight into the organisational processes, interpretive practices and governance capacities that shape institutional responses. This gap is particularly important given the growing expectations placed on universities to demonstrate leadership in sustainability, social responsibility and alignment with the Sustainable Development Goals.

2.e International and Comparative Perspectives

A growing body of international research highlights the expansion of modern slavery regulation across different contexts. In Australia, similar reporting requirements have increased disclosure but have not consistently strengthened due diligence or remediation (Nolan and Pryde, 2024; Caspersz et al., 2022). At the European level, emerging directives indicate a shift towards mandatory due diligence and integrated governance frameworks (European Parliament, 2023; Anti-Slavery International, 2021). Comparative studies across countries, including Bangladesh, Brazil, China and Sierra Leone, show that compliance-oriented approaches are insufficient to address structural drivers of exploitation (Jackson and Sparks, 2020; Jackson et al., 2020; Kluck et al., 2025; Balch et al., 2024). Instead, effective responses are associated with broader institutional factors such as labour protections, governance quality and social policy provision (Moussa et al., 2023; Neres et al., 2025).

2.f Synthesis and Research Gap

Across the literature, several consistent patterns emerge. Organisational responses to modern slavery remain uneven, with formal compliance frequently outweighing substantive due diligence. Structural vulnerabilities in supply chains, weak enforcement and limited stakeholder integration continue to constrain impact. While transparency legislation has increased awareness and disclosure, it has not

consistently produced improvements in labour conditions. Importantly, existing research offers limited empirical insight into how responsibility for modern slavery is interpreted, prioritised and enacted within institutions. In particular, there is a lack of theory-driven tools capable of assessing governance capacity, reflexive learning and the translation of commitments into practice. Research on higher education remains especially limited, with most studies focused on statements and giving limited attention to lived governance processes.

3. Theoretical framework

3.1 Modern Slavery Regulation as Governance: A Multi-Lens Evaluation

Evaluations of anti-slavery regulatory frameworks increasingly recognise that these statutes operate less as self-contained solutions and more as governance interventions embedded within complex supply chain, regulatory and organisational ecosystems. Contemporary scholarship assesses these regulations through multiple theoretical lenses that foreground different mechanisms of change, limitations and policy implications (Ishaya et al., 2024; Han et al., 2024; Pinnington et al., 2023; Carlea and Brewer, 2023; McGaughey et al., 2022; Flynn and Walker, 2021; Schaper and Pollach, 2021; Martin-Ortega, 2017). These approaches demonstrate why disclosure-based regimes often generate variable outcomes and why effectiveness depends on how legal duties interact with supply chain structures, institutional incentives and wider political economy conditions.

One influential lens draws on socially sustainable supply chain management and benchmarking theory, conceptualising modern slavery as a systemic outcome of fragmented global production networks characterised by power asymmetries, subcontracting and weak accountability (Ishaya et al., 2024). From this perspective, anti-slavery regulatory frameworks are evaluated not primarily as legal compliance instruments but as catalysts for operational governance changes, such as supplier mapping, recruitment oversight, grievance mechanisms and remediation capacity. Benchmarking frameworks translate legal expectations into comparative performance metrics, allowing organisations to be assessed against recognised standards across dimensions such as traceability and worker voice. While this approach enhances measurability and comparability, it also highlights the risk that firms prioritise what can be benchmarked over deeper transformations in purchasing practices and labour relations (Ishaya et al., 2024).

A second major body of work evaluates anti-slavery regulatory frameworks through institutional theory, focusing on how coercive, normative and mimetic pressures shape corporate behaviour (Han et al., 2024; Carlea and Brewer, 2023; Flynn and Walker, 2021). Within this framework, transparency legislation is understood to operate primarily through reputational exposure, professional norms and peer imitation, with direct enforcement playing a more limited role. Firms are therefore expected to converge around similar reporting templates, policies and governance structures, a process commonly described as

institutional isomorphism. While this lens explains observed patterns of policy adoption and disclosure convergence, it also indicates persistent gaps between formal compliance and substantive practice, particularly where sanctions are weak and monitoring is limited (Carlea and Brewer, 2023; Flynn and Walker, 2021). Institutional analysis thus reframes limited impact not as policy failure per se, but as an anticipated outcome of light-touch regulatory design (Han et al., 2024).

Closely related, legitimacy theory provides a communicative and interpretive lens for assessing why firms engage in modern slavery reporting and how disclosure practices evolve over time (Schaper and Pollach, 2021; Martin-Ortega, 2017). Here, anti-slavery regulatory frameworks are evaluated according to whether reporting plausibly reflects organisational change or primarily serves to maintain social legitimacy under stakeholder scrutiny. This literature usefully distinguishes between symbolic and substantive disclosure, while increasingly conceptualising substance as a continuum, not a binary outcome. Although this approach sharpens analytical attention to narrative quality and credibility, it remains largely firm-centric and places limited emphasis on structural power relations within supply chains, except where these emerge indirectly from reported practices (Schaper and Pollach, 2021).

Business and human rights frameworks offer a more normative and accountability-oriented evaluation of anti-slavery regulatory frameworks, situating them within international human rights law and due diligence obligations (Martin-Ortega, 2017). From this perspective, transparency requirements are insufficient on their own and are assessed according to whether they stimulate meaningful human rights due diligence, including ongoing risk identification, prevention, mitigation and access to remedy across all tiers of supply chains. This lens explicitly highlights the limitations of disclosure-only regimes and has driven comparative engagement with stronger due diligence models, particularly those that enable judicial scrutiny and legal accountability beyond reporting. As a result, anti-slavery regulatory frameworks are often evaluated in relation to adjacent legal developments, instead of being examined in isolation (Martin-Ortega, 2017).

Reflexive law and meta-regulation theories further conceptualise anti-slavery regulatory frameworks as forms of indirect governance that seek to reshape corporate behaviour through disclosure, dialogue and internal self-regulation, with less reliance on prescriptive rules (McGaughey et al., 2022). Under this lens, effectiveness depends on the quality of regulatory design and the strength of surrounding governance infrastructure, including guidance, civil society monitoring and the comparability of disclosures. Importantly, this framework highlights the risk of cosmetic compliance and lowest-common-denominator harmonisation, particularly in transnational supply chains where authority is dispersed across states, firms and non-state actors. Comparative analyses demonstrate how variations in legal architecture condition the reflexive capacity of disclosure regimes (McGaughey et al., 2022).

More recent contributions draw on transparency and disclosure theory to interrogate why reporting quality remains limited despite formal legal obligations (Pinnington et al., 2023). This work

distinguishes analytically between the costs of discovering information and the risks of disclosing it, arguing that discovery costs represent a more binding constraint in the context of modern slavery. By introducing concepts such as the disclosure of ‘known unknowns’, this lens shifts evaluative attention towards firms’ investments in supply chain intelligence, worker-reported data and verification systems. It indicates that reforms aimed at reducing discovery costs may be as important as strengthening disclosure mandates (Pinnington et al., 2023).

Several studies supplement governance-focused frameworks with a structural political economy perspective, emphasising poverty, migration regimes, labour market precarity and global value chain segmentation as foundational drivers of modern slavery risks (Han et al., 2024; Ishaya et al., 2024; Martin-Ortega, 2017). From this viewpoint, anti-slavery regulatory frameworks are evaluated according to whether they engage with the commercial determinants of exploitation, including pricing pressure, outsourcing incentives and recruitment market structures. This lens clarifies why transparency reforms may stabilise compliance without altering the underlying economic conditions that reproduce vulnerability, particularly in contexts characterised by weak worker voice and intermediated labour markets (Han et al., 2024; Martin-Ortega, 2017).

These theoretical lenses demonstrate that the effectiveness of anti-slavery regulatory frameworks cannot be assessed through disclosure volume alone. Instead, evaluation depends on the analytical frame applied, whether operational performance change, institutional incentives and legitimacy dynamics, human rights due diligence and accountability, regulatory design within polycentric governance systems, or information discovery constraints (Ishaya et al., 2024; Pinnington et al., 2023; Carlea and Brewer, 2023; McGaughey et al., 2022; Schaper and Pollach, 2021; Flynn and Walker, 2021; Martin-Ortega, 2017). A multi-lens approach therefore provides a more rigorous and policy-relevant assessment of modern slavery legislation, while also explaining why transparency-based regimes continue to generate variable outcomes across sectors and jurisdictions.

3.2 Justification for the Pluralistic Framework for the Study of Economic Exploitation

The selection of the Pluralistic Framework for the Study of Economic Exploitation (Drydakis and Martell, 2026) as the theoretical foundation of this study is motivated by both the limitations of existing approaches and the specific analytical requirements of the research. As discussed in Section 3.1, prevailing frameworks used to examine modern slavery, including institutional theory, legitimacy theory, supply chain governance approaches and transparency-based regulation, provide valuable insights into organisational behaviour, reporting practices and regulatory dynamics (Han et al., 2024; Ishaya et al., 2024; Flynn and Walker, 2021; Schaper and Pollach, 2021; Martin-Ortega, 2017). However, these approaches are primarily oriented towards observable outputs such as disclosure, compliance and policy

adoption, and offer more limited analytical capacity for examining how economic exploitation is structurally embedded, interpreted and operationalised within institutional contexts.

In particular, existing frameworks tend to treat modern slavery as a problem of risk management, reputational exposure or regulatory compliance. This approach can obscure its deeper character as a form of systemic economic exploitation rooted in power asymmetries, labour market segmentation and global inequalities. As a result, they are less well suited to analysing how institutions engage with the underlying drivers of exploitation, including the distribution of power within supply chains, the role of knowledge production, and the inclusion or exclusion of affected groups in governance processes (Han et al., 2024; Ishaya et al., 2024). The Pluralistic Framework for the Study of Economic Exploitation is particularly appropriate for addressing these limitations because it explicitly conceptualises exploitation as a structural, relational and normative phenomenon. Its six interrelated principles collectively provide an analytical lens that extends beyond compliance-oriented evaluation. This enables the study to examine not only whether universities respond to modern slavery, but how they understand its causes, whose knowledge informs their responses, and how responsibility is enacted across governance, operations and knowledge practices.

The framework is also well aligned with the research aims of this study. First, the study seeks to move beyond disclosure-based analysis towards a practice-oriented assessment of institutional governance. The framework's emphasis on relational ontology and methodological diversity supports this shift by foregrounding organisational processes, lived practices and context-specific dynamics. Second, the study aims to evaluate whether universities engage with modern slavery in a reflexive and justice-oriented manner. The framework's normative and intersectional dimensions provide the conceptual tools necessary to assess such engagement, particularly in relation to power, inequality and inclusion. Third, the study develops a systematic measurement instrument. The framework's structured set of principles allows these theoretical dimensions to be translated into measurable indicators, supporting consistent and comparable assessment across institutions. In addition, the Pluralistic Framework for the Study of Economic Exploitation is particularly suited to the higher education context. Universities are not only economic actors embedded in supply chains, but also epistemic institutions that shape knowledge, norms and policy debates. The framework's emphasis on epistemic pluralism and engaged scholarship enables the analysis to capture this dual role, which is not adequately addressed in more narrowly defined governance or compliance-based approaches.

3.3 The Pluralistic Framework for the Study of Economic Exploitation

The Pluralistic Framework for the Study of Economic Exploitation (Drydakis and Martell, 2026) applies Drydakis's (2026a) Pluralistic Framework for the Study of Socioeconomic Phenomena, which has been used to train economics researchers through the Royal Economic Society. Structured around six

interrelated principles, the framework provides a comprehensive approach to understanding how economic exploitation, as a foundation of modern slavery, is generated, reproduced and contested. By integrating structural analysis, epistemic pluralism, intersectional awareness, normative commitment, methodological diversity and engaged scholarship, the framework conceptualises exploitation as a relational and systemic phenomenon that undermines human dignity, obstructs sustainable development and sustains inequalities across global, national and local contexts. In this way, it positions economic exploitation as a central barrier to achieving the Sustainable Development Goals. Within this framework, modern slavery is conceptualised as an acute and legally recognisable expression of economic exploitation, not as a phenomenon detached from everyday economic relations. It is understood as arising where structural inequalities, constrained labour mobility, asymmetrical bargaining power and institutional failures intersect to produce conditions of coercion, unfreedom and severe dependency. Modern slavery is therefore treated as a relational condition embedded in labour markets, supply chains and organisational practices, not as an isolated criminal aberration. This conceptualisation allows modern slavery to be analysed simultaneously as a structural outcome, a lived experience and a justice concern, consistent with the framework's emphasis on relationality, plurality and ethical engagement.

The first principle, Structural and Relational Ontology, situates economic exploitation within enduring power structures and interdependencies across classes, genders and regions. Exploitation is not an aberration but a constitutive feature of economic systems that depend on asymmetrical relations between capital and labour, colonial and postcolonial dependencies and institutional mechanisms that entrench inequality (Prey, 2012; Murphy, 2001; Hausman, 1999; Cullenberg, 1998; Elster, 1986). This perspective highlights how wage-setting practices, segmented labour markets, global supply chains and ownership structures normalise extraction and precarity, obstructing progress on Sustainable Development Goals relating to poverty, inequality and decent work (Lockwood, 2021; McKeown, 2016; Zwolinski, 2012). It calls on researchers to interrogate the institutional arrangements that sustain exploitation and to examine reforms directed towards redistribution and justice (Menard and Shirley, 2024; Pinnington et al., 2023; Dobos, 2019).

The second principle, Epistemic Pluralism and Situated Knowledge, emphasises that the study of economic exploitation should draw on diverse intellectual traditions and lived experiences. It values contributions from economics, sociology, anthropology and history, alongside the situated knowledges of marginalised groups in the Global South, women, racialised communities and informal workers (Ganeri, 2019; Meyenburg, 2018). By foregrounding excluded voices, this principle challenges epistemic hierarchies and disciplinary silos, fostering participatory and context-sensitive inquiry (Truc et al., 2023; Buyalskaya et al., 2021; Simandan, 2019; Fosket, 2016; Haraway, 2013; Harding, 1995). Recognising that all knowledge is situated affirms that those most affected by exploitation offer interpretive depth that

is essential for designing effective and just responses (Guy and Arthur, 2021; King, 2013; Adkisson, 2010).

The third principle, Intersectional and Decolonial Analysis, highlights how exploitation is sustained through overlapping hierarchies of race, gender, class, caste and coloniality. Intersectionality, rooted in Black feminist thought, demonstrates how identities interact to create compounded vulnerabilities, such as those faced by racialised migrant women in precarious work (Arun and Olsen, 2023; Guglielmi, 2023; Giammarinaro, 2022; Frankema and Buelens, 2013; Crenshaw, 2013). Decolonial analysis situates present-day inequalities within the long history of colonial extraction, slavery and imperialism, tracing their persistence in trade regimes, debt dependency and global value chains (Mendoza, 2020; Gradin, 2016; Frankema and Buelens, 2013). By linking lived experiences to global structures, this principle shows why some societies remain trapped in cycles of poverty and dependency. It also highlights the need for transformative reforms, not merely narrow technocratic adjustments (Giammarinaro, 2022; Crenshaw, 2013; Drydakis et al., 2023; Drydakis, 2026b; 2022).

The fourth principle, Normative Commitment to Justice, Equity and Transformation, asserts that research on exploitation is inherently normative. Economic analysis cannot be separated from questions of justice, since exploitation directly undermines dignity, fairness and human rights (van Staveren, 2024; Gilabert, 2019; Steiner, 2018; Cullenberg, 1998). This principle strengthens political economy by making explicit the moral dimensions of economic outcomes and by requiring that inquiry contribute to emancipatory goals such as universal social protection, collective bargaining and ecological justice (Sandberg, 2015; Sayer, 2000). Far from reducing rigour, reflexive engagement with values enhances accountability and ensures that research remains aligned with the ethical foundations of the Sustainable Development Goals, particularly those addressing inequality, decent work and justice (van Staveren, 2024; Gilabert, 2019; Steiner, 2018; Mongin, 2006; Sayer, 2000; Cullenberg, 1998).

The fifth principle, Methodological Diversity and Grounded Inquiry, recognises that no single approach can capture the multi-scalar and complex nature of exploitation. It calls for methodological pluralism, combining quantitative techniques such as econometrics and modelling with ethnography, participatory action research and historical analysis (Van Assche et al., 2023; Gräbner and Strunk, 2020; Dow, 2007; Blaug, 1992). Grounded inquiry ensures that research remains embedded in real-world contexts and informed by the lived experiences of those most affected (Mohajan and Mohajan, 2022; Finch, 2002; Hall and Callery, 2001; Haig, 1995). This methodological flexibility enhances validity and supports inclusive knowledge production, helping to uncover hidden or informal forms of exploitation, including unpaid care work, algorithmic labour control and economic abuse within households (Belfrage and Hauf, 2015; Strauss, 2012; Hall and Callery, 2001; Dow, 2012).

The sixth principle, Engaged Scholarship and Evidence-Informed Policymaking, stresses that research on exploitation should be both analytically rigorous and practically relevant. Scholarship is

conceived as an active contributor to social transformation through dialogue with policymakers, civil society and affected communities (Fursova, 2023; Luger et al., 2020; Nzinga et al., 2018; Van de Ven, 2007). It calls for knowledge that supports legal reform, procurement standards and collective mobilisation, while strengthening civic engagement and accountability (Turin et al., 2022; Lester et al., 2020; Shearer et al., 2018; Head, 2016). By linking academic inquiry to policy and practice, engaged scholarship ensures that the study of exploitation contributes directly to building more equitable economic systems and advancing the Sustainable Development Goals (Turin et al., 2022; Gordon da Cruz, 2017).

The six principles are not intended to operate in isolation but as mutually reinforcing elements of a pluralistic paradigm. Structural and relational ontology provides a foundation for recognising how systemic inequalities shape exploitation, while epistemic pluralism ensures that this recognition is informed by diverse perspectives and contexts. Intersectional and decolonial analysis deepens these structural insights by showing how overlapping identities and global hierarchies create differentiated vulnerabilities. Normative commitment to justice, equity and transformation connects these analyses to ethical imperatives, guiding institutions towards emancipatory outcomes. Methodological diversity and grounded inquiry translate these commitments into practice by embedding plural and participatory approaches in research, while engaged scholarship and evidence-informed policymaking extend them into the public sphere, ensuring accountability and impact. The principles form an interdependent framework that balances structural analysis, inclusivity, ethical orientation, methodological innovation and practical engagement, offering a robust lens for studying exploitation and advancing sustainable development.

The Pluralistic Framework for the Study of Economic Exploitation addresses key limitations identified in existing scholarship and practice on modern slavery. As discussed in Section 3.1, research shows that institutional statements frequently prioritise symbolic compliance, provide limited evidence of substantive effectiveness and rarely incorporate survivor perspectives or participatory forms of inquiry. The framework offers higher education officers a structured way to address these limitations by situating modern slavery within the broader relational, institutional and ethical conditions through which exploitation is produced and sustained. Unlike the regulatory and governance-oriented lenses reviewed in Section 3.1, the Pluralistic Framework for the Study of Economic Exploitation is explicitly attuned to the distinctive institutional position of universities. Higher education institutions function simultaneously as employers, procurers, global consumers, knowledge producers and civic actors. They are embedded in international supply chains through outsourced services, international recruitment, research procurement and global partnerships, while also advancing claims of public value, social responsibility and educational mission. The framework's emphasis on structural and relational ontology highlights how exploitative relations persist within routine institutional arrangements, while avoiding an evaluation limited to formal compliance with reporting obligations.

The Pluralistic Framework for the Study of Economic Exploitation also places particular emphasis on epistemic pluralism and situated knowledge, which is especially salient in university settings where expertise, authority and legitimacy are formally institutionalised. The framework foregrounds lived experience, survivor perspectives and knowledge from the Global South, allowing institutional analysis to move beyond managerial, legalistic or audit-driven accounts of modern slavery. This is particularly important in higher education, where knowledge production itself constitutes a site of power and where dominant institutional narratives may marginalise those most directly affected by exploitation within supply chains and service provision. Through its intersectional and decolonial orientation, the Pluralistic Framework for the Study of Economic Exploitation is well suited to examining how modern slavery risks are differentially distributed across university-related labour markets and supply chains. The framework indicates how vulnerability to forced labour is shaped by race, gender, class, migration status and colonial legacies, dynamics that are closely intertwined with global education markets, international labour mobility and historically entrenched inequalities reproduced within higher education systems. This enables a more precise understanding of differentiated vulnerability than that offered by more general governance-oriented lenses.

The Pluralistic Framework for the Study of Economic Exploitation aligns closely with the public-facing role of universities as civic institutions through its normative commitment, methodological diversity and emphasis on engaged scholarship. Universities are not only regulated organisations but also sites of ethical leadership, policy influence and social learning. The framework supports forms of inquiry and action that extend beyond reputational risk management, enabling universities to engage with modern slavery as a justice-oriented institutional challenge. In this way, it complements the approaches reviewed in Section 3.1, while adding a more institutionally attuned, ethically grounded and analytically comprehensive lens for examining modern slavery within higher education.

4. The Modern Slavery Reflexive Assessment Scale

4.1 Scale development

The development of the Modern Slavery Reflexive Assessment Scale followed DeVellis's (2003) framework to ensure conceptual clarity, methodological rigour and practical utility. While the six principles of the Pluralistic Framework for the Study of Economic Exploitation provide a comprehensive conceptual foundation, their transformative potential depends on their operationalisation in ways that enable consistent assessment across institutions and contexts. The scale was designed to address this need by offering a structured, standardised and rigorous tool that moves beyond fragmented approaches to provide credible and comparable evidence of anti-slavery performance.

In step 1, the nature of the scale was defined. The scale aims to measure a university's reflexive engagement with modern slavery across governance, operations, knowledge practices, participation and

Sustainable Development Goals alignment (Ishaya et al., 2024; Han et al., 2024; McLaren et al., 2024; Moussa et al., 2023; Carlea and Brewer, 2023; McGaughey et al., 2022; Flynn and Walker, 2021; Schaper and Pollach, 2021; Martin-Ortega, 2017). Grounded in the six principles, it captures whether institutions treat modern slavery as systemic and historically rooted, engage plural forms of knowledge, adopt an intersectional and decolonial perspective, demonstrate a justice-oriented commitment, use methodologically diverse and grounded inquiry, and connect scholarship to evidence-informed policymaking (Drydakis and Martell, 2026). The objective is to move from abstract commitments to tangible, comparable indicators that inform policy, risk management and sector-wide learning.

In step 2, the item pool was generated through a structured, theory-informed process. Development was guided by the principles of the Pluralistic Framework for the Study of Economic Exploitation, alongside higher education policy guidance, procurement and supply chain practice, labour standards, and a broad body of scholarship on exploitation and governance (Menard and Shirley, 2024; Fursova, 2023; Guglielmi, 2023; Giammarinaro, 2022; Ishaya et al., 2024; Han et al., 2024; McLaren et al., 2024; Moussa et al., 2023; Carlea and Brewer, 2023; McGaughey et al., 2022; Flynn and Walker, 2021; Lockwood, 2021; Schaper and Pollach, 2021; Gräbner and Strunk, 2020; Lester et al., 2020; Mendoza, 2020; Meyenburg, 2018; Steiner, 2018; Martin-Ortega, 2017; Haraway, 2013; Prey, 2012; Strauss, 2012; Mongin, 2006; Murphy, 2001; Cullenberg, 1998; Harding, 1995). The items were not directly adopted from a single existing instrument but were originally developed for this study, drawing on three complementary sources. First, the principles provided the primary conceptual foundation, with each item designed to capture a specific dimension in observable institutional terms, ensuring alignment between theory and measurement. Second, existing research and practice-based frameworks on modern slavery governance informed the identification of recurring dimensions, including governance structures, risk assessment, worker voice, and monitoring practices (Ishaya et al., 2024; Han et al., 2024; McLaren et al., 2024; Moussa et al., 2023; Carlea and Brewer, 2023; McGaughey et al., 2022; Flynn and Walker, 2021; Schaper and Pollach, 2021; Martin-Ortega, 2017). These dimensions were synthesised and translated into context-specific indicators relevant to higher education. Third, items were designed to reflect operational practices within university settings, including procurement processes, employment practices, governance arrangements, and knowledge production activities, enabling the instrument to capture both formal commitments and their enactment in practice.

Draft items were written in accessible, practice-oriented language to ensure usability across institutional roles, including policy, procurement, human resources, estates, research and teaching. This process resulted in an initial pool of 96 items spanning multiple domains, reflecting the interconnected nature of institutional engagement. Each item was then assigned to a specific principle through a deductive, concept-driven mapping process grounded in the analytical structure of the Pluralistic Framework for the Study of Economic Exploitation. Classification was based on the extent to which each

item captured the core analytical focus of a given principle. The mapping process prioritised conceptual clarity and theoretical alignment, ensuring that each item operationalised a distinct dimension of the framework while remaining interpretable within institutional practice. Where items were relevant to more than one dimension, classification was determined by the dominant analytical focus reflected in the item wording and intended measurement objective, thereby avoiding duplication across principles. The item pool was subsequently refined through expert review and pilot testing. This stage assessed conceptual alignment, clarity, and feasibility, and reviewed the allocation of items across principles to ensure consistency and minimise overlap. This iterative process supported content validity and internal coherence, resulting in a theoretically grounded and systematically organised final instrument.

In step 3, the measurement format was determined. A five-point Likert agreement scale was adopted for all items, supporting clarity, comparability across units and sensitivity to incremental change (DeVellis, 2003). To operationalise the scale, participants were invited to assess each item based on their institutional knowledge and professional experience, indicating the extent to which the specified practices were present within their university. Responses were collected using a structured and standardised format to ensure comparability across participants and institutions. Further details on instrument administration and reliability considerations are provided in Section 5.

In step 4, given the conceptual and ethical complexity of modern slavery, multiple forms of pre-testing were undertaken to assess item clarity, relevance and interpretability prior to full deployment. Expert review and item refinement were undertaken. Expert review involved 19 specialists drawn from four groups to ensure both theoretical rigour and practical relevance. These included academics with expertise in modern slavery, political economy and labour exploitation ($n = 6$); senior higher education leaders responsible for policy, compliance and governance ($n = 5$); practitioners in procurement, human resources and estates with direct responsibility for supply-chain and employment practices ($n = 4$); and representatives from worker and survivor advocacy organisations ($n = 4$). All respondents had direct involvement in, or close proximity to, compliance functions related to modern slavery reporting, due diligence or risk management, and were engaged either in coordinating institutional responses or advising senior leadership. The reviewers had substantial professional experience, averaging six years, typically spanning several years in governance, compliance or operational roles within higher education, which positioned them to provide informed reflections on both formal commitments and day-to-day practices.

These four groups of experts reflect the decentralised governance of modern slavery in universities, where responsibility spans strategy, operations, knowledge production and participation. Academics contribute insight into systemic, historical and intersectional framings of exploitation and the alignment of institutional discourse with scholarly standards; senior leaders are positioned to assess strategic priorities, leadership signalling, accountability mechanisms and resource allocation; operational practitioners provide insight into how policies are enacted through procurement, employment and supplier

engagement; and worker and survivor representatives ensure that assessments of voice, participation and remedy are grounded in affected perspectives. Many reviewers occupied hybrid or coordinating roles (e.g. modern slavery leads or sustainability managers), requiring regular engagement across departments. This reviewer design ensures that items relating to strategic decision-making, procurement practices and normative commitments can be meaningfully assessed from an institutional perspective consistent with the scale's purpose.

Importantly, this multi-profile reviewer approach is consistent with the theoretical foundations of the scale. The principles form an interdependent framework that balances structural analysis, inclusivity, ethical orientation, methodological diversity and practical engagement, instead of functioning as isolated domains. Capturing these intersections requires perspectives that cut across governance, operations, knowledge practices and participation. Engaging academics, senior leaders, operational practitioners, and worker and survivor representatives was therefore essential to reflect how commitments under one principle (e.g. strategic recognition of structural exploitation) are realised through others (e.g. procurement practices, leadership decisions, knowledge production and voice mechanisms). This alignment between reviewer design and the interdependent structure of the framework supports the scale's capacity to capture institution-wide patterns of engagement.

The draft pool underwent structured review with particular attention to survivor-centred and intersectional phrasing, alignment with auditable practice and links to Sustainable Development Goal targets. Expert review assessed each item's conceptual alignment with the relevant principle and feasibility of assessment within university settings, recognising the decentralised governance structures through which modern slavery responsibilities are distributed across policy, procurement, human resources, estates and academic units. In addition, beyond assessing clarity and feasibility, the expert review was designed to evaluate items against multiple forms of validity appropriate to an institutional-level governance scale. The logic of review-stage validity assessment can be illustrated using Item A1 under Principle One (Structural and Relational Ontology): 'Our modern slavery strategy recognises economic exploitation as systemic and historically produced, not a set of isolated incidents.' The expert review panel evaluated this item in several ways. In terms of face validity, participants assessed whether the item clearly captured an institution's underlying conceptual framing of modern slavery, distinguishing systemic recognition from episodic or compliance-driven interpretations. With respect to content validity, the panel considered whether the item appropriately reflected a core element of strategic governance, particularly in relation to how modern slavery is framed within institutional policies and statements. For construct validity, reviewers linked their assessments to the presence or absence of explicit references to structural causes, historical legacies or global supply-chain dynamics within institutional modern slavery strategies. Some participants noted that institutions with well-developed strategies could readily substantiate agreement with documentary evidence, whereas others observed that such framing was

implicit, not explicit, leading to more cautious responses. This variation indicated that the item was sensitive to meaningful differences in institutional approach and did not elicit uniformly high endorsement. In assessing criterion-related validity, reviewers referred to concrete artefacts such as modern slavery statements, ethical procurement frameworks and staff training materials when forming their judgements, in order to assess whether item responses could be grounded in verifiable institutional evidence, not abstract commitments. With respect to discriminant validity, reviewers considered whether Item A1 captured a distinct conceptual dimension that was not duplicated by items focused on operational processes or reporting mechanisms. Finally, reviewers assessed whether the item was perceived as repetitive or unnecessary when considered alongside other items under Principle One, indicating acceptable differentiation within the scale.

Following this evaluative review, feedback was systematically logged and reviewed, leading to the removal of items judged to be redundant or insufficiently actionable, the rewording of items where interpretation varied across reviewers, and the separation of conceptually adjacent items to distinguish symbolic recognition from operational implementation. In several cases, items initially framed at the level of policy commitment were revised to require evidence of operational practice, while others were refined to improve precision regarding responsibility, scope or evidentiary thresholds. To reduce the risk that variation in responses reflected linguistic artefacts instead of substantive institutional practices, items were pre-tested with reviewers prior to pilot testing. Care was taken to retain sufficient nuance to capture symbolic and substantive dimensions of engagement, particularly where institutions may be more willing to endorse rhetorical commitments than to operationalise them in practice. Feedback from these stages directly informed scale refinement, reducing the item pool from 96 to 60 items while preserving conceptual breadth, with ten items retained under each principle.

In step 5, pilot testing was conducted to examine how the refined instrument functioned in practice within university settings. Unlike the expert review stage, which focused on conceptual alignment and item refinement, pilot testing assessed whether the full set of items operated coherently as an integrated instrument when completed by institutional respondents. The purpose was to evaluate usability, response processes and the capacity of the scale to elicit meaningful and differentiated reflections on institutional engagement with modern slavery. Pilot testing was undertaken with seven respondents from three universities, who completed the full scale and subsequently participated in structured follow-up discussions. The participants had multifaceted duties related to the modern slavery agenda, including procurement and supply chain management, governance, human resources and international partnerships. The average length of time in relevant roles was seven years. These discussions explored whether items were understood consistently across roles, whether response options were appropriate and whether the instrument enabled respondents to reflect on both formal policies and everyday practices. Particular attention was given to whether items prompted respondents to consider

evidence beyond written commitments, such as operational procedures, training coverage, supplier engagement and monitoring activities. Insights from the pilot phase indicated that the items functioned as intended. Respondents reported that the questions were clear, relevant to their institutional responsibilities and feasible to answer based on available information. No items were identified as confusing, redundant or misaligned with university practices, and no additional item revisions were required following this stage. The pilot also confirmed that the scale could differentiate levels of institutional engagement, with respondents noting variation across governance areas and avoiding uniformly high or low responses. These findings provided further support for the instrument's content validity and practical applicability, justifying progression to full-scale data collection.

In addition to the expert-led assessment of content, construct, criterion-related and discriminant validity described above, internal consistency of the refined scale was assessed following data collection. In step 6, item analysis and scale optimisation were undertaken. Once data collection was complete, and given the nature of the phenomenon and the relatively small observation base, internal consistency of the full scale was assessed using Cronbach's alpha coefficient, as exploratory factor analysis requires a larger sample size. To maximise interpretability and usefulness for decision-making, scores are reported at two levels: principle-level sections (ten items each) and the full-scale score (60 items). Results are mapped to performance bands that translate numerical scores into maturity levels consistent with the framework's normative commitments. As detailed in the section Scale values and cut-off points, these bands provide criterion-referenced benchmarks that facilitate accountability, cross-institutional comparison and internal learning cycles.

To operationalise the scale, participants were invited to assess each item based on their institutional knowledge and professional experience, indicating the extent to which the specified practices were present within their university. Responses were collected using a structured and standardised format, ensuring comparability across participants and institutions. To enhance consistency and reliability, participants were provided with clear guidance on item interpretation and assessment criteria, and the instrument was designed using practice-oriented language accessible across different institutional roles. This approach supports systematic evaluation while allowing respondents to draw on context-specific knowledge. A detailed account of the data collection procedures, including instrument administration and reliability considerations, is provided in Section 5.

Appendix A, Table A.0 provides a structured overview of the scale development process. It summarises the six-step procedure followed in constructing the Modern Slavery Reflexive Assessment Scale, outlining the purpose, key activities and outputs of each stage. The table is intended to enhance transparency and clarity by presenting the sequential logic through which the instrument was developed, from initial conceptualisation and item generation to validation and final scale construction.

4.2 Scale description

The Modern Slavery Reflexive Assessment Scale operationalises the six principles of the Pluralistic Framework for the Study of Economic Exploitation into a structured set of measurable indicators. By translating normative and analytical commitments into practice-oriented items, the scale provides universities with a diagnostic tool for evaluating the depth and consistency of their anti-modern slavery and anti-economic exploitation practices across governance, operations and external engagement. As shown in **Appendix Tables A1–A6**, Principle One: Structural and Relational Ontology assesses whether universities frame modern slavery as systemic and historically rooted, moving beyond the limitations of isolated, compliance-focused disclosures. Items cover risk registers, procurement and employment practices, and integration with Sustainable Development Goals such as poverty reduction, decent work, reduced inequalities and strong institutions. Principle Two: Epistemic Pluralism and Situated Knowledge evaluates the extent to which institutions draw on interdisciplinary expertise, survivor perspectives and insights from marginalised communities, directly addressing the absence of diverse voices and participatory approaches in existing practice.

Moreover, Principle Three: Intersectional and Decolonial Analysis examines whether universities recognise how intersecting inequalities, including gender, race, migration status, disability and class, shape vulnerability to exploitation, and whether procurement, training and monitoring practices respond to unequal global power relations. Principle Four: Normative Commitment to Justice, Equity and Transformation measures leadership commitment, survivor-centred approaches, resource allocation, accountability mechanisms and the integration of justice-oriented values into institutional decision-making, addressing the literature's finding that commitments are often aspirational but poorly embedded. In addition, Principle Five: Methodological Diversity and Grounded Inquiry evaluates whether institutions adopt varied, context-sensitive approaches to risk assessment and monitoring. Items move beyond standardised audits to include worker voice, piloted interventions, community engagement and transparent evaluation practices linked to sustainable procurement. Principle Six: Engaged Scholarship and Evidence-Informed Policymaking captures universities' contributions to research, teaching, partnerships and civic engagement, reflecting higher education's role in shaping evidence-informed policy and aligning efforts with Sustainable Development Goals on education, decent work, partnerships and justice.

In addition to being organised by principle, the scale is structured around a cross-cutting thematic matrix. Each of the sixty items is mapped onto five critical themes that represent the main domains of institutional engagement related to anti-modern slavery. Policy and Governance items capture strategies, leadership, commitments and accountability structures. Operations and Practices capture procurement, human resources and day-to-day activities. Evidence and Knowledge capture data, audits, monitoring systems, research and evaluation. Voice and Participation capture survivor perspectives, staff feedback,

student involvement and community engagement. Sustainable Development Goals alignment assesses the extent to which institutional actions are explicitly linked to the UN 2030 Agenda.

Several items span multiple themes, reflecting the interdependence of institutional practices. Approximately nineteen items address policy and governance, fifteen cover operations and practices, eighteen relate to evidence and knowledge, eleven focus on voice and participation, and fifteen are linked to Sustainable Development Goals alignment. This matrix structure allows the scale to be analysed in two complementary ways. First, by principle, it highlights whether dimensions such as intersectional analysis or normative commitment are strongly or insufficiently developed. Second, by theme, it indicates whether institutions perform better in areas such as governance while remaining less developed in worker participation or Sustainable Development Goals integration. This dual perspective responds to concerns in the literature about inconsistent responses and symbolic compliance, while enabling universities to identify practical levers for change, such as strengthening evidence systems, embedding participatory processes or deepening links with global sustainability agendas. These relationships are illustrated in **Figure 1**.

In the **Appendix, Table B0** serves a clarifying and integrative role within the scale architecture by making explicit the relationship between the Pluralistic Framework for the Study of Economic Exploitation and the empirical structure of the Modern Slavery Reflexive Assessment Scale. By mapping each principle to its core analytical focus, the institutional domains assessed and illustrative indicator types, the table demonstrates how theoretical commitments are systematically translated into measurable dimensions of university practice. This mapping confirms that the scale is a theory-driven instrument, not a collection of ad hoc indicators, with each block of items anchored in a specific analytical logic derived from the framework. Table B0 is organised into four columns. The first identifies each principle of the framework. The second summarises its core analytical focus in accessible terms. The third specifies the institutional domains through which the principle is operationalised, while the fourth points to illustrative indicators and corresponding item blocks, directing readers to detailed operationalisation.

The value of this mapping is illustrated through the first principle, Structural and Relational Ontology. This principle conceptualises economic exploitation, and modern slavery in particular, as systemic and historically produced, embedded in enduring power relations, not arising from isolated or exceptional incidents. Without explicit operationalisation, such a perspective risks remaining abstract. Table B0 shows how this analytical commitment is rendered empirically tractable through indicators spanning governance, procurement, employment practices and alignment with the Sustainable Development Goals. In practical terms, this means that universities are assessed not only on whether they acknowledge modern slavery risks in principle, but on whether such risks are embedded in strategic and operational risk registers, whether power relations within supply chains are actively examined, and whether institutional decisions are evaluated in relation to Sustainable Development Goals on poverty

reduction, decent work, reduced inequalities and strong institutions. The scale items therefore move beyond disclosure quality to interrogate how institutional structures, policies and decision-making processes may reproduce or mitigate exploitative relations.

4.3 Innovations of the Modern Slavery Reflexive Assessment Scale

The Modern Slavery Reflexive Assessment Scale extends the literature in several important ways by shifting the focus of assessment from formal disclosures to institutional practice. Unlike most existing studies, which primarily analyse the content of modern slavery statements, this research is grounded in the reflections of officers responsible for shaping and implementing institutional responses. This perspective captures the deliberations, constraints and priorities that influence governance behind formal disclosures, providing a more grounded account of how commitments are interpreted and enacted in practice. The scale does not evaluate institutional statements in the abstract. It probes concrete dimensions of university practice, including governance arrangements, procurement and supply chain management, human resource policies, financial decision-making and partnerships. It also responds to the long-recognised absence of survivor and worker voice by assessing whether institutions meaningfully involve survivors, staff, unions and Global South partners in shaping anti-slavery responses. By systematically incorporating intersectional and decolonial perspectives, the scale ensures that vulnerabilities linked to race, gender, class, disability and colonial legacies are recognised. Its alignment with the Sustainable Development Goals situates modern slavery within a broader global development agenda encompassing poverty reduction, decent work, reduced inequalities and strong institutions.

The scale further strengthens institutional decision-making by embedding accountability in tangible and comparable measures of performance. It enables universities to evidence commitments, identify areas of strength and weakness, and prioritise reform, while reducing compliance and reputational risks. When applied longitudinally, the scale supports monitoring of progress or decline over time, generating iterative learning and anonymised benchmarking that highlights sectoral patterns. In this way, it bridges the gap between fragmented qualitative disclosures and the growing demand for systematic evidence, offering both diagnostic insight and aspirational benchmarks to inform resource allocation, training priorities and strategic alignment with sustainability agendas. For senior officers, benchmarking against peer institutions supports strategic improvement, while externally the scale enhances accountability to stakeholders including students, staff, workers and communities. More broadly, it strengthens the case for embedding justice-oriented practice within institutional governance. Universities that adopt reflexive anti-slavery strategies are better positioned to anticipate regulatory change, reinforce supply-chain resilience and build trust with partners, while the scale's Sustainable Development Goals orientation enhances global visibility and positions institutions as credible leaders in ethical governance and attractive collaborators in research, funding and international engagement.

A further innovation lies in how the scale extends and complements existing approaches to assessing institutional responsibility for modern slavery. Much of the existing literature relies on disclosure-based and compliance-oriented approaches, including analyses of modern slavery statements, benchmarking tools, audit and self-assessment regimes, disclosure indices and emerging transparency technologies (Ishaya et al., 2024; Han et al., 2024; Carlea and Brewer, 2023; Moussa et al., 2023; McGaughey et al., 2022; Flynn and Walker, 2021; Schaper and Pollach, 2021; Martin-Ortega, 2017). While these approaches have been valuable in establishing baseline transparency and regulatory awareness, evidence consistently points to a gap between symbolic and substantive responses, with disclosure often prioritised over due diligence, worker-driven monitoring, and remediation. As a result, formal outputs tend to obscure how responsibility is interpreted, prioritised and enacted within institutions, particularly in relation to power relations, knowledge production and voice.

By contrast, the Pluralistic Framework for the Study of Economic Exploitation provides an evaluative lens that reorients assessment away from symbolic compliance towards reflexive governance. Operationalised through the Modern Slavery Reflexive Assessment Scale, the framework interrogates how institutions understand exploitation as a systemic phenomenon, how different forms of knowledge are produced and weighted, whose voices are included or excluded, and how normative commitments to justice are embedded in decision-making. This enables assessment not only of whether institutions comply with reporting requirements, but of how responsibility is operationalised across governance, operations and external engagement. In this sense, the scale does not replace existing methods of institutional assessment, but adds a critical and diagnostic dimension that allows researchers and practitioners to distinguish between rhetorical recognition and substantive engagement, to identify fragmentation across institutional domains, and to evaluate alignment with broader social and developmental objectives such as the Sustainable Development Goals. This evaluative extension strengthens the originality of the framework by demonstrating how political economy concepts of exploitation and responsibility can be translated into systematic and comparable tools for assessing institutional conduct.

4.4 Scale values and cut-off points

The scale employs a standard five-point Likert response format, enabling officers to indicate their level of agreement with each affirmative statement. Response values range from 1 (Strongly Disagree) to 5 (Strongly Agree). Higher scores (4–5) indicate strong alignment with a given principle, middle scores (3) suggest variability or partial implementation, and lower scores (1–2) signal areas of limited or absent engagement that require significant attention. This design positions institutions clearly on a continuum from minimal recognition to advanced practice.

Each item is scored between 1 and 5, giving a section range of 10–50 points (ten items per principle) and an overall scale range of 60–300 points (sixty items across six principles). To enhance interpretability, results can be mapped onto four performance bands. For individual sections, average scores of 1.0–2.0 (totals of 10–20) represent the nascent stage, where recognition of modern slavery risks is very limited. Scores of 2.1–3.0 (totals of 21–30) fall within the developing band, indicating partial or compliance-driven approaches. The established band (3.1–4.0, totals of 31–40) reflects coherent, embedded practices linked to the Sustainable Development Goals, while the leading band (4.1–5.0, totals of 41–50) denotes proactive, sector-influencing practice with strong reflexivity and continuous improvement.

The same logic applies to the full scale. Universities with totals of 60–120 (nascent) have minimal systems or policies, while scores of 121–180 (developing) reflect compliance elements that lack integration. Totals of 181–240 (established) signal embedded practice with clear Sustainable Development Goals contributions, and 241–300 (leading) indicate sector-leading performance with demonstrable impact on policy, scholarship and sustainable development outcomes.

Translating raw scores into average per-item values preserves the integrity of the measurement, since each response option reflects a distinct intensity of agreement. Cut-offs convert these results into criterion-referenced benchmarks, ensuring comparability across institutions and over time. Performance bands provide clarity for officers and governing bodies by offering a straightforward diagnostic tool that supports continuous improvement, not only compliance. They also enable benchmarking within and across institutions, revealing sector-wide gaps such as weaker performance in intersectional analysis or voice and participation. From a theoretical perspective, the bands are explicitly aligned with the six principles of the framework. A flat numerical score risks being treated as a tick-box measure, whereas interpretive categories give results normative meaning. Nascent reflects policies that exist mainly on paper with limited structural understanding; developing captures emerging but fragmented practices; established signals coherent embedding across functions; and leading denotes fully reflexive, transformative and sector-shaping practice. This alignment ensures that the scale reflects its underlying commitments to justice, equity and structural change.

5. Data gathering and study variables

5.1 Data gathering

The sampling frame consisted of public universities in the UK listed by Times Higher Education ($n = 109$). From this pool, a random sample comprising half of the institutions was drawn ($n = 54$). These universities were invited to participate in the study via email. Random selection at the institutional level was applied prior to recruitment in order to reduce selection bias and strengthen the external credibility of the sample, distinguishing the design from convenience-based or purely purposive approaches (Olken and

Rotem, 1995). Invitations targeted officers with formal responsibilities related to the modern slavery agenda, including procurement, governance and compliance, legal services, human resources, estates, finance, international partnerships, and research management. This role-targeted recruitment reflects the cross-functional nature of modern slavery governance in universities and strengthens content validity by ensuring that participants were directly involved in policy development, implementation, or oversight. The use of clearly defined role criteria also supports consistency in participant selection across institutions, reducing ambiguity regarding institutional representation. The full invitation letter outlined the purpose of the study and the expected time commitment.

Eighteen universities agreed to participate, yielding a response rate of 33 per cent. The participating universities represent approximately 17 per cent of the total population of UK universities. In the context of institution-level research on governance and compliance involving senior professional staff, this response rate is consistent with established norms. Importantly, the participating universities varied in institutional mission in relation to pedagogy and research, geographic location, and performance against the Sustainable Development Goals, supporting meaningful exploration of variation across the sector. The inclusion of multiple participants in half of the participating institutions further strengthened internal triangulation and reduced reliance on single-role perspectives.

In line with the study's design, the Modern Slavery Reflexive Assessment Scale was administered to institutional officers as the primary data collection instrument. The scale is designed to enable systematic and comparable assessment across institutions while remaining sensitive to contextual variation in governance arrangements. Data were collected through online meetings conducted via a video-conferencing platform. Meetings were scheduled at times convenient to participants, with a planned duration of approximately 75 minutes, as indicated in the invitation materials. The researcher facilitated each session using a short script to ensure consistent administration across institutions. This standardised and reflexive approach balances comparability with depth, making it particularly appropriate for governance-focused research. Participation was open to either an individual officer or a team of colleagues collectively responsible for the university's modern slavery strategy and governance. Where a single officer attended, that individual completed the instrument during the meeting. Where more than one colleague joined, the same set of questions was asked and a single agreed response per item was recorded following brief deliberation. Responses were entered in real time into a structured data capture template that mirrored the item order and scaling.

At the start of each meeting, the facilitator restated the study's aims, clarified the structure of the instrument, and confirmed that responses would be used for research purposes and reported without identifying individual participants. The 60 items were then read verbatim in sequence. For each item, participants indicated their position on the five-point scale ranging from "Strongly disagree" to "Strongly agree". The facilitated format ensured that all items were covered systematically, reducing the risk of

partial or incomplete responses that can arise in self-administered surveys. The presence of a facilitator also allowed participants to seek clarification where needed, supporting consistent interpretation across institutions. In group settings, the format encouraged reflection and deliberation, leading to agreed institutional responses, not fragmented individual views. Participation was voluntary, verbal consent was recorded at the start of each meeting, and no sensitive personal data were collected beyond role descriptors. Raw data were stored securely, with access restricted to the research team.

The unit of analysis in this study is the institution, not the individual respondent. Each observation represents a complex organisational case, informed by senior officers with formal responsibility for modern slavery governance and substantial role tenure. Data collection involved a multi-item assessment administered through structured interview-based meetings, generating high information density per case. The analytical aim is to explain variation in governance approaches, not to estimate population parameters, which is consistent with established practice in institutional and governance research where smaller samples are common.

5.2 Study variables

To provide a fuller picture of the participating institutions and to enable comparative analysis, a set of institutional-level variables was identified. Given the study's focus and population of interest, one key variable captured whether universities had published written commitments on anti-modern slavery, specifically whether a Modern Slavery Statement or related policies were available on their public website. A second variable recorded whether universities had been working on anti-modern slavery for more than seven years. This distinction enabled comparison between institutions with longer-standing engagement and those at earlier stages of implementation, providing insight into potential associations between institutional maturity and responses to the survey instrument.

The sustainability orientation of universities was assessed using the Times Higher Education Impact Rankings 2023–2025. These rankings provide a global benchmark of university performance against the Sustainable Development Goals, evaluating contributions across teaching, research, governance, and partnerships. By integrating social, environmental, and economic dimensions, the rankings capture the extent to which sustainability and responsibility are embedded within universities' core missions. A binary variable was created to identify institutions achieving average scores either above or below 85, offering an indicator of broader commitments to sustainability, governance, and social responsibility. Institutional profile was further captured through a variable indicating Russell Group membership, recognising the research-intensive character of these universities and the resources that may be available for implementing modern slavery initiatives. A complementary variable identified whether a university is based in London, reflecting the distinctive policy, regulatory, and stakeholder environment associated with the capital.

Finally, two variables reflected features of the data collection process. The first recorded whether more than one officer contributed responses from a given university, with team-based participation potentially indicating a higher degree of internal deliberation in shaping institutional positions. The second was the composite score on the Modern Slavery Reflexive Assessment Scale, which, as discussed earlier, measures the extent to which universities' strategies and practices align with the six principles of the Pluralistic Framework for the Study of Economic Exploitation.

6. Descriptive statistics

6.1 Modern Slavery Reflexive Assessment Scale

Table 1 presents data from 18 universities across the UK, of which 27.8 per cent are located in the capital. The sample includes both research-intensive and teaching-focused institutions, reflected in the presence of Russell Group universities (44.4 per cent), as well as universities with differing procurement scales and levels of international engagement. All participating institutions reported written commitments on anti-modern slavery (100.0 per cent). In terms of institutional maturity, 50.0 per cent reported more than seven years of engagement with anti-modern slavery initiatives, while 44.4 per cent achieved sustainability ranking scores above 85. This variation in institutional type, experience, and governance capacity supports meaningful exploration of differences in approaches to modern slavery governance across the UK higher education system.

During data collection, reflections were provided by more than one participant in half of the universities (50.0 per cent). In total, 31 participants took part in the study. Participants held multifaceted responsibilities related to the modern slavery agenda, including procurement and supply chain management (58 per cent), governance and compliance (54 per cent), legal services (48 per cent), human resources (37 per cent), estates and facilities management (19 per cent), finance (10 per cent), international partnerships (25 per cent), and research management (16 per cent). This distribution of roles reflects the cross-functional nature of modern slavery governance in UK higher education, where responsibility is typically centred on procurement, compliance, and legal functions, with supporting input from human resources, estates, international partnerships, and research management. The average length of service in relevant roles was eight years.

The principles of the Pluralistic Framework for the Study of Economic Exploitation demonstrated moderate levels of engagement across the sample. The highest mean score was recorded for Structural and Relational Ontology ($M = 41.22$), followed by Epistemic Pluralism and Situated Knowledge ($M = 39.38$). Lower mean scores were observed for Intersectional and Decolonial Analysis ($M = 35.77$), Normative Commitment to Justice, Equity, and Transformation ($M = 36.72$), Methodological Diversity and Grounded Inquiry ($M = 36.44$), and Engaged Scholarship and Evidence-Informed Policymaking ($M = 37.66$). The difference in mean scores between Structural and Relational Ontology and the remaining

principles is statistically significant at the 1 per cent level. The composite Modern Slavery Reflexive Assessment Scale, calculated across 60 items, produced a mean score of 227.22, indicating substantial but differentiated engagement with the framework across participating universities. The internal consistency of the scale was high, with a reliability coefficient of 0.851.

[Table 1]

Appendix Table A1 presents the descriptive statistics for Principle One: Structural and Relational Ontology. The results indicate strong recognition of exploitation as a systemic issue, with high levels of agreement that modern slavery strategies acknowledge its structural and historical roots ($M = 4.61$). Universities also consistently reported that modern slavery and economic exploitation risks appear on their strategic and operational risk registers, with defined controls and designated owners ($M = 4.55$). Several items indicate moderate levels of engagement. Universities reported reviewing how procurement, partnerships, recruitment, and estates operations may reproduce unequal power relations ($M = 3.33$), as well as how cross-departmental policies reinforce anti-exploitation aims ($M = 3.38$). Institutions also reported mapping dependencies and worker voice within supply chains ($M = 3.44$) and monitoring how employment practices, such as casualised contracts or subcontracting, may heighten exploitation risks ($M = 3.94$). Higher levels of agreement were recorded for items linking institutional action to the Sustainable Development Goals. Universities indicated that planned actions address both structural drivers and day-to-day practices ($M = 4.33$), and that modern slavery policies are frequently linked to poverty reduction, decent work and economic growth, and reduced inequalities ($M = 4.50$). Institutions also considered how university operations intersect with peace, justice, and strong institutions ($M = 4.55$), as well as how financial and partnership decisions align with anti-exploitation commitments and the Sustainable Development Goals more broadly ($M = 4.55$).

Appendix Table A2 presents the descriptive statistics for Principle Two: Epistemic Pluralism and Situated Knowledge. Universities reported a strong tendency to draw on multiple forms of expertise and perspectives. High levels of agreement were recorded for the inclusion of input from academic disciplines such as law, sociology, anthropology, political science, and economics ($M = 4.55$). Similarly, operational decisions on modern slavery risks were frequently informed by professional expertise from legal, financial, human resources, procurement, and estates staff, alongside cost or compliance considerations ($M = 4.27$). Universities also indicated that practice-based and qualitative insights were given equal weight to quantitative data in decision-making ($M = 4.50$), and that feedback from staff working directly with suppliers, students, or communities was regularly acted upon ($M = 4.27$). Engagement with affected groups was reflected in high levels of agreement that workers, unions, and community organisations were involved in setting anti-exploitation priorities ($M = 4.38$), and that advisory forums ensured worker, student, and community perspectives were incorporated into ongoing strategy design ($M = 4.55$). By contrast, lower levels of agreement were reported for the direct use of survivor and worker perspectives in

shaping responses to modern slavery (M = 2.66), for explicitly incorporating perspectives from historically marginalised communities in the Global South (M = 2.83), and for engaging with knowledge produced by Global South partners and minoritised groups (M = 2.77). In addition, universities reported that their education and research strategies explicitly contributed to inclusive and equitable education and to global partnerships (M = 4.55).

Appendix Table A3 presents the descriptive statistics for Principle Three: Intersectional and Decolonial Analysis. Universities reported higher levels of agreement with recognising the ways in which overlapping identities and social structures create vulnerability. Risk assessments were reported to consider the role of gender, race, migration status, disability, and class in shaping vulnerability (M = 4.27). Similarly, universities indicated that overlapping identities, such as those of migrant women or disabled workers, were examined for their implications for vulnerability to exploitation (M = 4.38). Staff training that explicitly addresses racism, sexism, ableism, and related social structures was reported less strongly (M = 2.94). With respect to procurement, universities indicated limited attention to addressing unequal global power dynamics in supplier relationships (M = 2.77) and to ensuring that fair work expectations apply equally in Global South and UK contexts (M = 2.66). When exploitation was identified, there was some indication of prioritising the protection and improvement of worker conditions before disengagement (M = 3.16). Monitoring practices that disaggregate modern slavery data by identity characteristics to identify unequal impacts were reported at relatively low levels (M = 2.55). The integration of intersectional analysis into broader sustainability and equity frameworks varied. Universities reported incorporating identity factors into risk analysis that intersects with gender equality and decent work (M = 4.22). Attention to global inequalities was less evident, with lower levels of agreement that supply chain reviews address disparities between the Global North and South while supporting reduced inequalities and peace, justice, and strong institutions (M = 2.27). Universities reported a higher level of agreement that collaborations and partnerships are designed to avoid exploitative or one-sided arrangements, promoting equitable outcomes (M = 4.50).

Appendix Table A4 presents the descriptive statistics for Principle Four: Normative Commitment to Justice, Equity and Transformation. Universities reported high levels of agreement that public commitments on modern slavery should emphasise dignity, equity and structural change, not compliance alone (M = 4.55). Senior leaders were also reported to consistently communicate expectations and model accountability in their actions (M = 4.44). Other areas reflected more moderate engagement. Decisions that give meaningful weight to human rights even where financial or operational costs increase were reported at a moderate level (M = 3.55). Survivor-centred approaches in incident management, grievance mechanisms, and remedy were reported less frequently (M = 2.94). Similarly, clear accountability mechanisms, safe reporting routes, and independent escalation options were less established (M = 2.55). The allocation of dedicated resources, such as budget and staff time, was moderately observed (M =

3.00), while actions aimed at driving structural change in labour conditions and supply chains were also limited (M = 2.77). Universities more strongly aligned their commitments with global justice and development frameworks. Public commitments were reported to contribute to advancing social justice and poverty eradication (M = 4.33). Decision-making processes were explicitly linked to gender equality, decent work, and reduced inequalities (M = 4.05). Furthermore, universities indicated that they prioritised the needs of the most vulnerable and those furthest behind, in line with the Sustainable Development Goals Agenda (M = 4.50).

Appendix Table A5 presents the descriptive statistics for Principle Five: Methodological Diversity and Grounded Inquiry. Universities reported high levels of agreement that modern slavery is addressed using diverse methods, including data analysis, audits, worker-voice tools, interviews, and document reviews (M = 4.44). Risk assessments were also described as historically informed and context-sensitive (M = 4.27). Tailoring approaches to the risks of different sectors and regions, instead of applying a one-size-fits-all model, was strongly endorsed (M = 4.38). Worker perspectives and civil society involvement were highlighted as important. Universities reported that civil society and community organisations were involved in monitoring or evaluation activities (M = 4.17), and that knowledge derived from lived experience and worker voice was treated as equally valid as audit findings or data analysis in decision-making (M = 4.50). By contrast, more limited engagement was observed in relation to piloting and evaluating interventions. Universities reported only modest agreement that anti-exploitation interventions were piloted, evaluated, and refined (M = 2.05), or that supplier assessments combined formal checks with direct engagement, such as worker interviews or community dialogue (M = 2.44). Similarly, the transparent sharing of findings to support collective learning and progress towards the Sustainable Development Goals was less consistently reported (M = 2.72). Universities also reported alignment between their evaluation practices and the Sustainable Development Goals. Evaluations were described as contributing to sustainable procurement and responsible consumption (M = 4.16), while piloted interventions were assessed for their relevance to decent work and, where appropriate, to innovation and infrastructure (M = 3.27).

Appendix Table A6 presents the descriptive statistics for Principle Six: Engaged Scholarship and Evidence-Informed Policymaking. Universities reported strong collaboration with academic units and external experts to strengthen practice and policy on modern slavery (M = 4.16). Research and teaching were also reported to contribute to sector guidance or public policy (M = 4.38), and students and staff were engaged in modules, projects, or campaigns to build understanding of modern slavery (M = 4.44). More moderate levels of agreement were reported in relation to monitoring and collective action. Universities indicated that Modern Slavery Statements included evidence, key performance indicators and progress tracking, not narrative description alone (M = 3.22). Participation in sector initiatives and frameworks designed to strengthen supplier accountability was less frequently reported (M = 2.94), while

the sharing of lessons with peer institutions and adaptation based on external benchmarks was limited ($M = 2.55$). Universities also emphasised a broader scholarly role. There was strong agreement that modern slavery scholarship contributes to collective mobilisation and democratic accountability, not solely compliance ($M = 4.38$). Teaching and research on modern slavery were reported to explicitly highlight contributions to the Sustainable Development Goals, including quality education, decent work, and partnerships for the goals ($M = 4.11$). Collaboration with governments, non-governmental organisations, and international partners was less consistently highlighted, although some attention was given to improving protections for workers and supporting reduced inequalities, as well as peace, justice, and strong institutions ($M = 3.33$). Finally, universities indicated that they track and share how modern slavery scholarship and partnerships contribute to broader Sustainable Development Goals reporting and civic engagement ($M = 4.11$).

6.2 Tabulation analysis

Table 2 reports the tabulation analysis for the Modern Slavery Reflexive Assessment Scale. Universities that had been engaged in anti-modern slavery initiatives for more than seven years reported a higher mean score ($M = 231.33$, $n = 9$) than those with fewer than seven years of engagement ($M = 223.11$, $n = 9$), with the difference statistically significant ($t = 5.103$, $p < 0.01$). Similarly, universities achieving sustainability scores above 85 in the Times Higher Education Impact Rankings 2023–2025 recorded a higher average score ($M = 231.88$, $n = 8$) than those with lower scores ($M = 223.50$, $n = 10$), and this difference was also statistically significant ($t = 5.273$, $p < 0.01$).

Universities located in the UK's capital reported a slightly higher mean score ($M = 229.60$, $n = 5$) than those located elsewhere ($M = 226.30$, $n = 13$), although this difference was not statistically significant ($t = 1.177$, $p > 0.10$). Russell Group universities ($M = 228.25$, $n = 8$) did not differ significantly from non-Russell Group institutions ($M = 226.40$, $n = 10$) ($t = 0.715$, $p > 0.10$). Similarly, universities where reflections were provided by more than one participant ($M = 228.89$, $n = 9$) showed only a small difference compared with those where a single participant contributed ($M = 225.56$, $n = 9$), which was also not statistically significant ($t = 1.346$, $p > 0.10$).

[Table 2]

6.3 Correlation matrix

Table 3 presents the correlation matrix for the Modern Slavery Reflexive Assessment Scale and institutional characteristics. Statistically significant and strong positive correlations were observed between the scale and universities that had been engaged in anti-modern slavery initiatives for more than seven years ($r = 0.787$, $p < 0.01$). A similarly strong and statistically significant correlation was identified between the scale and universities achieving sustainability scores above 85 in the Times Higher Education

Impact Rankings 2023–2025 ($r = 0.796$, $p < 0.01$). In addition, a strong positive correlation was found between long-term engagement in anti-modern slavery work and high sustainability rankings ($r = 0.894$, $p < 0.01$). By contrast, the scale showed only weak and statistically non-significant correlations with Russell Group membership ($r = 0.176$, $p > 0.10$), location in the UK's capital ($r = 0.282$, $p > 0.10$), and whether reflections were provided by more than one study participant ($r = 0.319$, $p > 0.10$).

[Table 3]

7. Study estimates

Table 4 reports the regression results for the Modern Slavery Reflexive Assessment Scale and its six underlying principles. In Model I, universities that had engaged in anti-modern slavery initiatives for more than seven years scored significantly higher on the full scale ($b = 7.882$, $p < 0.01$). In Model II, universities with sustainability scores above 85 in the Times Higher Education Impact Rankings 2023–2025 likewise achieved significantly higher full-scale scores ($b = 9.084$, $p < 0.01$).

The models focusing on individual principles (Models III–VIII) provide further insight. In Model IV, sustainability rankings were positively associated with Epistemic Pluralism and Situated Knowledge ($b = 1.859$, $p < 0.10$). In Model VI, they were positively associated with Normative Commitment to Justice, Equity and Transformation ($b = 1.652$, $p < 0.10$), while in Model VII a positive association was observed with Methodological Diversity and Grounded Inquiry ($b = 3.382$, $p < 0.05$).

Model fit statistics indicate strong explanatory power for the full scale, with R^2 values of 0.685 (Model I) and 0.808 (Model II), in contrast to the more modest explanatory capacity observed in the models for individual principles (Models III–VIII).

[Table 4]

8. Discussion

8.1 Outcomes evaluation

Consistent with prior studies on modern slavery governance, particularly work distinguishing between symbolic and substantive compliance, reflections from university officers indicate differentiated engagement with the principles of the Pluralistic Framework for the Study of Economic Exploitation (Martin-Ortega, 2017; Schaper and Pollach, 2021; Flynn and Walker, 2021; Han et al., 2024; Ishaya et al., 2024). The composite Modern Slavery Reflexive Assessment Scale, assessed across 60 items, produced a mean score of 227.22. This places universities within the Established performance band, suggesting that anti-slavery practices are consistently embedded and explicitly connected to the Sustainable Development Goals. This positioning aligns with literature showing that transparency-led regimes can prompt consolidation in governance structures and policy alignment, even where deeper operational transformation remains limited (Schaper and Pollach, 2021; Flynn and Walker, 2021; Han et al., 2024).

The Established classification therefore indicates progress beyond fragmented compliance towards more coherent governance and academic integration. At the same time, it underlines that universities have not reached a transformative stage in which survivor-centred approaches, sector leadership and systemic redistribution of power are fully realised. The performance banding thus serves as a benchmark, signalling both progress achieved and the development required to move towards the Leading category.

Crucially, these results draw on the perspectives of officers responsible for shaping, implementing and reporting modern slavery governance, not on analysis of institutional statements alone. This addresses a limitation highlighted in earlier research that relied heavily on disclosure analysis and was therefore less able to capture organisational deliberations behind formal reporting (Martin-Ortega, 2017; Schaper and Pollach, 2021). The approach adopted here captures the constraints, trade-offs and priorities shaping everyday governance (Flynn and Walker, 2021). It is also important to clarify that the Established banding reflects relative positioning within the scale, not an absolute judgement of institutional maturity. Earlier research on UK universities and corporate reporting more broadly has emphasised the symbolic nature of many responses under transparency-led regulatory frameworks (Martin-Ortega, 2017; Schaper and Pollach, 2021; Flynn and Walker, 2021). The present findings are consistent with this literature: institutions score more highly on rhetorical and policy-oriented items than on survivor-centred, participatory or decolonial practices, reinforcing the symbolic–substantive gap identified across sectors.

Although the study is not designed to generate statistically representative estimates for the higher education sector, convergence with evidence produced through alternative methods, sectors, and analytical traditions strengthens confidence in the conclusions. The outcome patterns align closely with recent reviews that conceptualise modern slavery as structurally embedded and characterised by persistent gaps between governance frameworks and substantive practice (Han et al., 2024; Ishaya et al., 2024). The combination of relatively strong policy and governance arrangements alongside weaker operational, participatory, and justice-oriented practices mirrors findings from firm-level and cross-sector studies based on disclosure analysis, benchmarking, and mixed-methods designs (Schaper and Pollach, 2021; Flynn and Walker, 2021).

Structural and Relational Ontology received the highest score, reflecting confidence in recognising exploitation as systemic and relational. This mirrors findings from institutional and political economy perspectives, which suggest that organisations are more comfortable acknowledging structural risk factors than altering operational practices that redistribute power or resources (Han et al., 2024; Flynn and Walker, 2021). Strength was most evident in policy and governance, with strategies, reporting lines, and risk registers firmly embedded, and in Sustainable Development Goals alignment, particularly in relation to poverty reduction, decent work, and justice. By contrast, operational practice and worker participation were less developed, indicating persistent difficulty in translating structural recognition into everyday decision-making.

Epistemic Pluralism and Situated Knowledge ranked second. Officers valued diverse disciplinary and professional perspectives, consistent with literature emphasising the multidisciplinary nature of modern slavery governance across law, business, and human rights (Martin-Ortega, 2017; McLaren et al., 2024). However, the lower score relative to Structural and Relational Ontology reflects the difficulty of embedding plurality in practice. As noted in prior studies, expertise-based pluralism often substitutes for the inclusion of marginalised or affected voices, reproducing epistemic hierarchies even where organisations appear open to diverse forms of knowledge. While evidence use was strong, survivor and Global South perspectives were less evident, suggesting that epistemic pluralism remains institutionalised through professional expertise, with limited reliance on participatory knowledge production.

More transformative principles scored lower. Intersectional and Decolonial Analysis recorded the weakest results, indicating limited capacity to address entrenched hierarchies of knowledge and power. Normative Commitment to Justice, Equity and Transformation was modest. Although policy and rhetorical commitments were common, practices such as disaggregated monitoring, accountability mechanisms and resource allocation remained underdeveloped. This pattern aligns closely with literature showing that justice-oriented and equity-centred dimensions of anti-slavery governance are the least developed under transparency-led regimes, precisely because they challenge institutional incentives and power relations (Han et al., 2024; Ishaya et al., 2024).

Closer inspection of individual items provides diagnostic insight into how this symbolic–substantive gap manifests in practice. Item-level contrasts reveal tensions between rhetorical alignment and operationalisation, a dynamic widely documented in analyses of disclosure-led regulation (Schaper and Pollach, 2021; Flynn and Walker, 2021). Direct survivor and worker participation in shaping responses was consistently weaker than representative consultation mechanisms, while recognition of intersectional risk did not translate into systematic use of disaggregated monitoring data. These contrasts highlight that, while universities endorse participatory and intersectional principles in principle, practices requiring redistribution of decision-making authority, resources, or epistemic legitimacy remain constrained (Han et al., 2024).

The relatively low scores for items relating to decolonial and Global South knowledge require careful interpretation. These items were intentionally framed to capture epistemic justice, not procurement logistics alone, focusing on whether marginalised perspectives and Global South knowledge systems are treated as legitimate sources of guidance in shaping strategy. The low averages therefore indicate reluctance to redistribute epistemic authority, not a lack of awareness of global inequality, consistent with critiques that technical compliance often displaces engagement with the political economy and epistemic foundations of exploitation (Martin-Ortega, 2017; Han et al., 2024).

Methodological Diversity and Grounded Inquiry was also constrained, reflecting reliance on established audits and legal procedures, with limited use of participatory or experimental approaches.

This echoes research showing that organisations privilege auditable, low-risk methods even where these provide limited insight into lived experience or structural drivers of exploitation (Schaper and Pollach, 2021; Pinnington et al., 2023). Evidence use was a relative strength. However, practices such as piloting interventions, supplier dialogue and transparent sharing of results remained limited. Engaged Scholarship and Evidence-Informed Policymaking scored slightly higher but remained moderate. The results reveal a clear hierarchy of engagement. Policy and governance commitments are most embedded, followed by evidence- and expertise-based knowledge practices, while operational change, participation, and justice-oriented transformation remain least developed. This hierarchy mirrors patterns identified across corporate and public-sector studies, reinforcing that the dynamics observed here reflect systemic features of transparency-led governance, not artefacts of sector or sample size (Flynn and Walker, 2021; Han et al., 2024).

Regression analysis highlights two institutional characteristics consistently associated with stronger engagement: the length of time a university has been involved in anti-slavery initiatives and its broader sustainability performance. Longer-standing commitments were associated with higher reflexive engagement, supporting literature emphasising organisational learning and continuity over one-off compliance responses. Sustainability performance also emerged as a significant factor. Universities with stronger sustainability profiles scored higher not only overall but particularly on epistemic pluralism, normative commitments to justice, and methodological diversity. This extends prior work by empirically demonstrating that integrated sustainability cultures provide enabling conditions for more reflexive and justice-oriented anti-slavery governance, instead of functioning as parallel or symbolic commitments (Carlea and Brewer, 2023; McGaughey et al., 2022).

This study makes four interrelated contributions that address key limitations in the existing literature. First, it responds to the predominant reliance on disclosure-based analyses by providing a practice-oriented examination of modern slavery governance within higher education institutions. Prior research has largely focused on institutional statements and reporting outputs, offering limited insight into how responsibility is interpreted and enacted in everyday organisational settings (Martin-Ortega, 2017; Schaper and Pollach, 2021). By drawing on the reflections of officers directly involved in governance processes, the study captures the internal dynamics, constraints, and decision-making logics that underpin institutional responses, thereby extending empirical understanding beyond symbolic disclosure. Second, the study advances theoretical understanding by applying the Pluralistic Framework for the Study of Economic Exploitation to the analysis of modern slavery governance. This approach conceptualises modern slavery as a structural, relational, and justice-oriented phenomenon, enabling a more comprehensive analysis of how power, knowledge, and institutional practices are interlinked. In doing so, it extends existing governance and compliance frameworks, which tend to prioritise risk management and reporting, by integrating structural, epistemic, and normative dimensions of exploitation. Third, the study

introduces a novel methodological contribution through the development and application of the Modern Slavery Reflexive Assessment Scale. The scale provides a systematic, theory-driven instrument that translates complex conceptual dimensions into measurable indicators, allowing for consistent and comparable assessment across institutions. This represents a shift from descriptive or document-based approaches towards structured evaluation of institutional practice. Finally, the findings generate practical and policy-relevant insights by identifying specific areas where institutional engagement remains limited, particularly in relation to participation, intersectional analysis, and justice-oriented transformation. By providing a diagnostic tool and empirical evidence on patterns of engagement, the study offers a foundation for institutional learning, benchmarking, and the design of more effective and equitable anti-slavery strategies within higher education and beyond.

8.2 The Reflexive Anti-Slavery Governance Model for Higher Education

The findings provide the basis for developing the Reflexive Anti-Slavery Governance Model for Higher Education as an interpretive synthesis of the empirical patterns identified in the study. The model is best understood as a set of interrelated developmental dimensions, not as a fixed sequence of stages. It explains how universities' anti-slavery responses can develop beyond disclosure-based compliance towards embedded, participatory and justice-oriented governance. The first dimension, Compliance Foundation, is reflected in statutory statements, policy commitments and formal risk procedures. The second, Institutional Embedding, concerns the integration of modern slavery governance across procurement, human resources, finance, partnerships, sustainability reporting and risk management. The third, Epistemic and Participatory Inclusion, captures the extent to which survivor-informed practice, worker voice, Global South knowledge and intersectional analysis shape institutional strategy. The fourth, Reflexive Learning, is expressed through monitoring, benchmarking, evaluation and adaptation over time. The fifth, Transformative Accountability, refers to universities' use of their civic, economic and epistemic roles to address exploitation as a structural justice issue. These relationships are illustrated in **Figure 2**.

The empirical outcomes provide the strongest grounding for the dimensions of Compliance Foundation and Institutional Embedding, as universities reported more developed practices in policy formation, governance arrangements and sustainability integration. They also justify the inclusion of Epistemic and Participatory Inclusion, Reflexive Learning and Transformative Accountability, although these dimensions appear less fully developed in practice. Lower levels of engagement with survivor-centred mechanisms, participatory monitoring, decolonial knowledge, iterative learning and impact evaluation indicate that universities have begun to move beyond disclosure-led compliance, while substantive transformation remains uneven. The model therefore captures both the areas where institutional governance is becoming more embedded and the areas where further reflexive and justice-oriented development is required.

The relationship between the scale and the model is complementary. The Modern Slavery Reflexive Assessment Scale provides the six-principle measurement architecture, grounded in the Pluralistic Framework for the Study of Economic Exploitation. The model offers an interpretive synthesis of the empirical pattern generated by that assessment. The six principles assess the depth and quality of institutional engagement across structural, epistemic, intersectional, normative, methodological and policy-oriented dimensions. The five model dimensions organise these results into a governance account that explains how universities' anti-slavery responses are structured, where they are becoming embedded and where further development is required. In this sense, the model condenses the six-principle assessment into an empirically grounded framework for understanding reflexive anti-slavery governance in higher education.

8.3 Policy implications

The findings indicate that anti-slavery strategies are most effective when embedded within broader sustainability frameworks. Universities with stronger sustainability profiles demonstrated higher levels of reflexive engagement, suggesting that integrating modern slavery governance within sustainability structures can better align institutional commitments with poverty reduction, decent work, reduced inequalities, and strong institutions. This is consistent with evidence that regulatory outreach and clearer benchmarks improve disclosure quality, while wider governance architectures support more coherent practice (Carlea and Brewer, 2023; McGaughey et al., 2022).

The empirical analysis identifies two institutional mechanisms most consistently associated with higher engagement scores: the longevity of institutional involvement in anti-slavery initiatives and broader sustainability performance. Universities with longer-standing engagement reported higher overall scores and stronger performance across several principles, indicating that continuity and organisational learning support movement beyond symbolic compliance. Sustained institutional commitment appears to enable the gradual development of internal capacity, cross-departmental coordination, and reflexive governance practices that are unlikely to emerge through short-term or reactive interventions alone. Sustainability performance emerged as a second key mechanism shaping engagement. Institutions with higher sustainability rankings not only scored more highly overall but also performed particularly well on epistemic pluralism, normative commitments to justice, and methodological diversity. This suggests that universities with established sustainability cultures are more likely to value diverse forms of knowledge, embed justice-oriented principles in decision-making, and deploy a wider range of tools for risk assessment and evaluation. In practical terms, anchoring anti-slavery governance within sustainability leadership, reporting structures, and accountability processes appears more effective than confining responsibility to legal or procurement functions.

Stronger collaboration across the sector is also required. Consistent participation in collective initiatives and partnerships with governments, NGOs, unions, and service providers would help address the underuse of key stakeholders identified in the literature and move efforts beyond firm-led compliance (McLaren et al., 2024; Martin-Ortega, 2017). Multi-stakeholder engagement can raise standards in procurement and labour practices while supporting more credible monitoring and remediation. The results also highlight specific institutional levers through which intersectional and survivor-centred approaches could be strengthened. Lower scores on survivor participation, disaggregated monitoring, and decolonial engagement suggest persistent barriers to redistributing voice and authority to those most affected by exploitation. Practical measures include integrating lived-experience expertise into staff training and policy development, establishing survivor-informed advisory mechanisms, and embedding participatory methods within risk assessment and evaluation. These steps directly address the gap between rhetorical commitments to inclusion and their operationalisation in governance practice.

Bridging the gap between normative commitments and operational practice also requires adequate resourcing and safeguards. Dedicated budgets, trained staff, safe reporting routes, clear accountability mechanisms, and survivor-centred grievance procedures can support the translation of justice-oriented aims into practice. This responds to evidence that institutional statements and training often outpace due diligence, worker-driven monitoring, and remediation, with whistleblowing and grievance mechanisms frequently limited or inaccessible (Han et al., 2024; Schaper and Pollach, 2021). Methodological innovation should be encouraged through piloting, evaluation, and transparent lesson-sharing, including participatory and community-based approaches that integrate worker voice into risk assessment and follow-up (Han et al., 2024; Ishaya et al., 2024). While universities reported strong use of audits and risk assessments, engagement with piloted interventions, direct supplier dialogue, and systematic lesson-sharing remained limited. Encouraging experimentation, evaluation, and iterative learning would help shift practice from procedural monitoring towards substantive impact, while public benchmarking and disclosure can further support collective learning and accountability across the sector.

Targeted action on intersectional and decolonial practice remains a priority. Staff development should address structural inequalities, and data systems should enable disaggregated monitoring of risks and impacts. Procurement and partnership frameworks need to account for global power asymmetries and apply fair work standards consistently across contexts, addressing shortcomings observed in university statements and supply chain oversight (Martin-Ortega, 2017; Schaper and Pollach, 2021). Survivor participation and Global South partnerships can be strengthened through advisory panels, participatory audits, and survivor-informed training and evaluation, thereby improving both legitimacy and effectiveness (McLaren et al., 2024). Institutional maturity continues to matter. Longer-standing engagement with anti-slavery initiatives was associated with more embedded practices, reinforcing evidence that regulatory prompts alone are insufficient and that continuity and sustained effort are

required for substantive change (Han et al., 2024; Ishaya et al., 2024). Policy instruments that raise baseline performance, such as central registries and proportionate penalties for non-publication, can complement institutional initiatives and support convergence towards higher standards (Moussa, Allam and Elmarzouky, 2023; McGaughey et al., 2022).

Benchmarking should be used to guide improvement, not encourage box-ticking. Transparent indicators, performance banding and regular re-administration can support internal learning and external accountability, addressing the tendency towards symbolic compliance observed across sectors (Schaper and Pollach, 2021; Flynn and Walker, 2021). Priorities for advancement include embedding survivor and worker participation in due diligence and remediation, investing in intersectional analysis and disaggregated monitoring, linking scholarship more directly to procurement and contract management, and sustaining multi-stakeholder governance that centres worker voice (McLaren et al., 2024; Ishaya et al., 2024).

8.4 Practical recommendations for practitioners and policymakers

This study provides a basis for translating reflexive assessment into concrete institutional and policy action. The Modern Slavery Reflexive Assessment Scale is designed not only to evaluate performance but also to guide improvement by identifying areas where governance, operational practice, and participation require strengthening. Building on this function, several practical recommendations emerge for practitioners and policymakers. For university practitioners, anti-modern slavery governance is most effective when operationalised as a cross-institutional responsibility, not confined to compliance, procurement or legal teams. Senior leadership teams can use the scale to identify imbalances between policy commitments and operational delivery, and to prioritise areas where responsibility is fragmented across departments. Embedding modern slavery objectives within routine governance processes, including strategic planning, risk management and sustainability reporting, can help ensure that commitments are translated into everyday decision-making, not left as declarative statements.

Strengthening survivor- and worker-centred practice requires institutional mechanisms that move beyond consultation towards structured participation. Universities can establish standing advisory arrangements that include lived-experience expertise, integrate survivor-informed perspectives into staff training and procurement decision-making, and ensure that grievance and reporting mechanisms are accessible, trusted, and independently supported. These measures are particularly relevant for addressing the weaker performance observed in participation, remediation, and accountability, and for aligning institutional practice with justice-oriented commitments. Operationally, procurement and partnership governance represent key leverage points. Practitioners can strengthen practice by extending supply-chain mapping beyond first-tier suppliers, applying fair work expectations consistently across domestic and international contexts, and incorporating worker voice into supplier engagement and evaluation.

Investment in data systems that support disaggregated monitoring can further enable institutions to identify differential risks and respond systematically to intersectional vulnerabilities.

Methodological practice can also be enhanced by complementing established audit and reporting tools with participatory and evaluative approaches. Piloting targeted interventions, engaging civil society and community organisations in monitoring, and sharing lessons across institutions can support iterative learning and reduce reliance on static compliance tools. The scale can be used periodically to assess progress, identify stagnation, and inform targeted improvements at both departmental and institutional levels. For policymakers, the findings underscore the importance of supporting continuity, capacity-building and integration, moving beyond reliance on disclosure requirements alone. Regulatory frameworks can be strengthened by aligning modern slavery reporting with broader sustainability, public procurement and equality governance structures. Clearer guidance on minimum expectations, standardised reporting fields and the use of central registries can enhance comparability while avoiding an exclusive focus on narrative disclosure.

Policy instruments can also incentivise collaboration and learning across the sector. Encouraging joint initiatives, shared benchmarking and multi-stakeholder engagement can help address common weaknesses in worker participation, remediation and supply-chain oversight. Public funders and regulators may further reinforce substantive engagement by recognising and rewarding institutions that demonstrate sustained improvement, methodological innovation and meaningful stakeholder involvement. Across both practice and policy domains, the Modern Slavery Reflexive Assessment Scale can function as a developmental tool, moving beyond the format of a compliance checklist. Its performance bands and principle-level scores allow institutions and regulators to identify priorities for action, monitor progress over time and distinguish between symbolic alignment and substantive change. Used in this way, the scale supports a shift from reactive compliance towards reflexive governance, aligned with broader objectives of reducing exploitation within higher education.

8.5 Limitations and future research

This study provides important insights into how universities engage with modern slavery and economic exploitation; however, several limitations should be acknowledged. These limitations also point towards clear directions for future research. The sample was restricted to 18 universities in the UK, which limits the generalisability of the findings. Although the participating institutions varied in size, type, geographical location, and sustainability performance, the results cannot be assumed to represent the full diversity of the higher education sector, either within the UK or internationally. Nevertheless, the findings are broadly consistent with the existing literature. Expanding future research to include a wider range of institutions, particularly those operating in different national and regulatory contexts, would help to test the framework's applicability across varied governance environments. Comparative studies between

countries with stronger and weaker legislative regimes would be particularly valuable for examining how regulatory context shapes institutional engagement.

The study relies on self-reported data from university officers responsible for modern slavery governance, which introduces the possibility of self-reporting and social desirability bias. Officers tasked with compliance, risk management, or sustainability may have incentives to portray their institutions positively, particularly given the reputational sensitivities surrounding modern slavery. Although anonymity was assured and respondents were encouraged to reflect critically on both strengths and weaknesses, the possibility that progress was overstated or shortcomings underreported cannot be excluded. Moreover, responses were collected through facilitated video calls and, in some cases, involved deliberation among more than one officer before agreeing on an institutional response. While this approach ensured informed input across functions, it may also have encouraged consensus positions that smooth over internal disagreement or variation in practice. Although tabulation analysis indicated that mean scores from institutions providing group responses did not systematically differ from those based on individual respondents, this remains a limitation. Future research could explicitly compare individual and collective responses within institutions to explore differences across roles, seniority, and functional responsibilities.

More broadly, reliance on officers' assessments may not fully capture discrepancies between stated commitments and on-the-ground practices. The pattern observed in the results, whereby policy-oriented and rhetorical commitments received higher scores than survivor-centred, decolonial, and data-intensive practices, may partly reflect this dynamic. Respondents may have been more comfortable affirming formal commitments than reporting on practices that are resource-intensive, politically sensitive, or less visible within established governance structures. The findings should therefore be interpreted as indicative of institutional orientation and reflexive engagement, while remaining distinct from direct measures of lived conditions within supply chains or workplaces.

Future research could address these limitations through systematic triangulation with additional data sources. Document analysis of procurement policies, supplier codes of conduct, annual reports, and sustainability disclosures would provide an external point of comparison with officer assessments. Qualitative interviews with other stakeholder groups, including contractors, suppliers, students, unions, and worker representatives, would further strengthen the evidence base by capturing perspectives that are often marginalised within institutional reporting. Such triangulation would allow researchers to assess alignment or divergence between formal commitments, internal perceptions, and lived experience.

In addition, statistical validation of the Modern Slavery Reflexive Assessment Scale was constrained by the relatively small sample size. While Cronbach's alpha indicated acceptable internal consistency, advanced techniques such as exploratory or confirmatory factor analysis could not be applied. The present study should therefore be understood as an exploratory and diagnostic application,

forming an initial stage in the instrument's development and validation. Larger-scale studies could refine the scale, test its dimensional structure, and assess predictive validity by linking assessment scores to observable changes in institutional practice, and procurement outcomes.

The cross-sectional design represents a further limitation. Universities operate within dynamic regulatory, political, and economic environments, and institutional responses to modern slavery evolve over time. Longitudinal research designs would allow scholars to examine whether improvements are sustained, how institutions adapt to regulatory change, and whether reflexive engagement translates into deeper structural reform. Repeated administration of the scale could support analysis of trajectories of change, identifying whether institutions move from symbolic alignment towards more substantive practice. Finally, the scope of future research extends beyond validation to expansion. Applying the Modern Slavery Reflexive Assessment Scale in other national contexts would enable cross-national comparison and testing of its relevance across different legal, cultural, and governance systems. Cross-sectoral applications, for example in public procurement, healthcare, or large corporate supply chains, could also assess the adaptability of the framework beyond higher education. These extensions would strengthen the scale's contribution as a cumulative research tool, positioning it as a foundation for comparative, longitudinal, and participatory scholarship on exploitation and institutional responsibility.

9. Conclusion

This study examined how universities engage with modern slavery governance and accountability by operationalising the Pluralistic Framework for the Study of Economic Exploitation through the development and application of the Modern Slavery Reflexive Assessment Scale. Drawing on data from UK universities, the analysis identified both areas of consolidation and persistent limitations in institutional responses. While many universities have introduced policies, statements and training in response to the Modern Slavery Act 2015, these efforts often remain procedural and unevenly embedded. Governance structures and sustainability integration are relatively well developed. In contrast, engagement with survivor-centred practice, intersectional and decolonial perspectives, and iterative learning remains limited.

The study makes several theoretical contributions. First, it advances the literature on modern slavery governance by reframing modern slavery as a concentrated manifestation of economic exploitation, moving beyond an isolated compliance framing. By operationalising the Pluralistic Framework for the Study of Economic Exploitation, the research moves beyond disclosure-based analysis and provides a theory-driven means of assessing governance capacity, reflexivity and justice orientation within institutions. Second, the findings empirically substantiate the symbolic–substantive gap identified in prior studies, while demonstrating how this gap manifests within higher education governance. The results indicate that universities are more confident in recognising structural risk and adopting policy

frameworks than in redistributing power, embedding participatory practice, or addressing epistemic and intersectional inequalities. Third, the analysis contributes to institutional and governance theory by identifying organisational learning and sustainability culture as enabling conditions for deeper engagement, extending existing conceptual work with empirical evidence from the higher education sector.

A further contribution is the development of the Reflexive Anti-Slavery Governance Model for Higher Education. The model synthesises the empirical findings into five interrelated developmental dimensions: Compliance Foundation, Institutional Embedding, Epistemic and Participatory Inclusion, Reflexive Learning, and Transformative Accountability. It clarifies how universities' anti-slavery responses can develop beyond disclosure-based compliance towards embedded, participatory and justice-oriented governance, while recognising that institutional development may be uneven across dimensions. By linking the Modern Slavery Reflexive Assessment Scale to an interpretive governance model, the study provides both a measurement tool and a conceptual framework for understanding how anti-slavery responsibility is structured, enacted and deepened within higher education institutions.

From a practical perspective, the study highlights the value of the Modern Slavery Reflexive Assessment Scale as both a diagnostic and developmental tool. The scale enables institutions to identify imbalances between policy commitments and operational practice, prioritise areas for improvement, and monitor progress over time. The findings suggest that anti-slavery governance is more effective when embedded within broader sustainability frameworks, extending beyond legal or procurement functions. Universities with stronger sustainability profiles and longer-standing engagement demonstrated higher levels of reflexive practice, indicating the importance of continuity, cross-departmental coordination and institutional learning. At the policy level, the results reinforce the limits of disclosure-based regulation when unsupported by accountability mechanisms, guidance and capacity-building. Policy instruments such as central registries, clearer benchmarks and proportionate sanctions can raise baseline performance, but substantive change is more likely where regulation is integrated with sustainability, public procurement and equality governance. The findings also underscore the need for stronger multi-stakeholder engagement, including collaboration with unions, civil society organisations and survivor-led initiatives, to move beyond firm- or institution-led compliance towards more credible monitoring and remediation.

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Table 1. Descriptive statistics.	
	Mean and standard deviation
Universities with written commitments on anti-modern slavery (%)	100.0 (0.0)
Universities working on anti-modern slavery for more than 7 years (%)	50.0 (0.514)
University sustainability ranking (scores > 85) (%) ^	44.444 (0.511)
Russell Group universities (%)	44.444 (0.511)
Universities located in the UK's capital (%)	27.777 (0.460)
Reflections from more than one study participant during data collection (%)	50.0 (0.514)
Principle One: Structural and Relational Ontology (c.)	41.222 (1.628)
Principle Two: Epistemic Pluralism and Situated Knowledge (c.)	39.388 (1.851)
Principle Three: Intersectional and Decolonial Analysis (c.)	35.777 (2.184)
Principle Four: Normative Commitment to Justice, Equity, and Transformation (c.)	36.722 (1.964)
Principle Five: Methodological Diversity and Grounded Inquiry (c.)	36.444 (2.639)
Principle Six: Engaged Scholarship and Evidence-Informed Policymaking (c.)	37.666 (1.814)
Modern Slavery Reflexive Assessment Scale (c.) ^^	227.22 (5.374)
<i>Notes: Observations from 18 UK universities. (c) Continuous variable. (^) The scale relates to the Times Higher Education Impact Rankings 2023-2025, which assess universities on their progress towards the Sustainable Development Goals. (^^) The scale reflects the Pluralistic Framework for the Study of Economic Exploitation and is assessed through 60 items. The six principles form the Pluralistic Framework for the Study of Economic Exploitation, with each principle assessed through 10 items.</i>	

Table 2. Tabulation analysis. Means and standard deviations

	Modern Slavery Reflexive Assessment Scale (c.) ^
Universities working on anti-modern slavery for more than 7 years	231.333 (2.549), n=9
Universities working on anti-modern slavery fewer than 7 years	223.111 (4.106), n=9
t-test	5.103, p<0.01
University sustainability ranking (scores > 85) ^^	231.875 (2.100), n=8
University sustainability ranking (scores ≤ 85) ^^	223.500 (4.062), n=10
t-test	5.273, p<0.01
Universities located in the UK's capital	229.600 (4.098), n=5
Universities not located in the UK's capital	226.307 (5.662), n=13
t-test	1.177, p>0.10
Russell Group universities	228.250 (5.175), n=8
Non-Russell Group universities	226.400 (5.660), n=10
t-test	0.715, p>0.10
Reflections from more than one study participant during data collection	228.888 (3.855), n=9
Reflections from only one study participant during data collection	225.555 (6.346), n=9
t-test	1.346, p>0.10

Notes: Observations from 18 UK universities. (c) Continuous variable. (^) The scale reflects the Pluralistic Framework for the Study of Economic Exploitation. (^^) The scale relates to the Times Higher Education Impact Rankings 2023-2025, which assess universities on their progress towards the Sustainable Development Goals.

Table 3. Correlation Matrix

	Modern Slavery Reflexive Assessment Scale ^	Universities working on anti-modern slavery for more than 7 years	University sustainability ranking (scores > 85) ^^	Russell Group universities	Universities located in the UK's capital	Reflections from more than one study participant during data collection
Modern Slavery Reflexive Assessment Scale ^	1					
Universities working on anti-modern slavery for more than 7 years	0.787 (0.000)***	1				
University sustainability ranking (scores > 85) ^^	0.796 (0.000)***	0.894 (0.000)***	1			
Russell Group universities	0.176 (0.484)	0.223 (0.372)	0.325 (0.188)	1		
Universities located in the UK's capital	0.282 (0.256)	0.124 (0.623)	-0.055 (0.827)	0.194 (0.440)	1	
Reflections from more than one study participant during data collection	0.319 (0.196)	0.111 (0.660)	0.000 (1.000)	0.000 (1.000)	0.372 (0.128)	1

*Notes: Observations from 18 UK universities. (^) The scale reflects the Pluralistic Framework for the Study of Economic Exploitation. (^^) The scale relates to the Times Higher Education Impact Rankings 2023-2025, which assess universities on their progress towards the Sustainable Development Goals. P-values are given in parentheses. (***) Statistically significant at the 1% level.*

Table 4. Regression outcomes								
	Model I. Modern Slavery Reflexive Assessment Scale [^]	Model II. Modern Slavery Reflexive Assessment Scale [^]	Model III. Principle One: Structural and Relational Ontology	Model IV. Principle Two: Epistemic Pluralism and Situated Knowledge	Model V. Principle Three: Intersectional and Decolonial Analysis	Model VI. Principle Four: Normative Commitment to Justice, Equity, and Transformation	Model VII. Principle Five: Methodological Diversity and Grounded Inquiry	Model VIII. Principle Six: Engaged Scholarship and Evidence- Informed Policymaking
Universities working on anti-modern slavery for more than 7 years	7.882 (1.678)***	-	-	-	-	-	-	-
University sustainability ranking (scores > 85) ^{^^}	-	9.084 (1.362)***	-0.073 (0.804)	1.859 (0.875)*	1.177 (1.051)	1.652 (0.858)*	3.382 (1.163)**	1.084 (0.877)
Russell Group universities	-0.170 (1.709)	-1.676 (1.391)	1.025 (0.821)	0.461 (0.894)	1.682 (1.073)	-1.798 (0.876)*	-1.527 (1.187)	-1.520 (0.896)
Universities located in the UK's capital	1.412 (1.999)	3.282 (1.575)*	-0.297 (0.930)	0.196 (1.012)	-0.515 (1.215)	2.353 (0.992)**	1.730 (1.345)	-0.185 (1.014)
Reflections from more than one study participant during data collection	1.986 (1.762)	2.239 (1.373)	1.432 (0.810)	0.267 (0.882)	0.616 (1.058)	-0.228 (0.865)	-1.021 (1.172)	1.172 (0.884)
F	7.10	13.70	1.21	1.62	1.46	2.46	2.36	1.41
Prob>F	0.002	0.000	0.351	0.227	0.271	0.097	0.107	0.285
R-squared	0.685	0.808	0.272	0.332	0.309	0.430	0.420	0.302

Notes: Observations from 18 UK universities. ([^]) The scale reflects the Pluralistic Framework for the Study of Economic Exploitation. (^{^^}) The scale relates to the Times Higher Education Impact Rankings 2023-2025, which assess universities on their progress towards the Sustainable Development Goals. The six principles constitute the Pluralistic Framework for the Study of Economic Exploitation. Standard errors are given in parentheses. (***) Statistically significant at the 1% level. (**) Statistically significant at the 5% level. (*) Statistically significant at the 10% level.

Appendix.**Table A0. Development Process of the Modern Slavery Reflexive Assessment Scale**

Step	Stage	Purpose	Key Activities	Outputs / Contribution to Next Stage
Step 1	Definition of scale construct	To define what the scale measures and its conceptual scope	Identification of reflexive engagement dimensions; grounding in the Pluralistic Framework for the Study of Economic Exploitation principles	Clear conceptual foundation linking theory to measurable dimensions
Step 2	Item pool generation	To develop a comprehensive set of indicators reflecting the conceptual framework	Theory-informed item development; synthesis of literature, policy, and practice; creation of 96 items; mapping to principles	Initial item pool aligned with theoretical and institutional dimensions
Step 3	Measurement format design	To ensure consistency and comparability of responses	Selection of Likert scale; structured response format; participant guidance	Standardised response framework
Step 4	Expert review and refinement	To assess clarity, validity, and relevance	Expert review across groups; validity assessment; item revision and reduction	Refined item pool (96 to 60 items)
Step 5	Pilot testing	To evaluate usability and functionality	Pilot with institutional respondents; follow-up discussions	Validated usability and clarity
Step 6	Validation and optimisation	To assess internal consistency and finalise the scale	Cronbach's alpha; scoring structure; performance bands	Final refined scale with benchmarking capability

Appendix

Table A1. Modern Slavery Reflexive Assessment Scale. Principle One: Structural and Relational Ontology

Items	Themes of Institutional Engagement Related to Anti-Modern Slavery	Mean (standard deviation)
A1. Our modern slavery strategy recognises economic exploitation as systemic and historically produced, not a set of isolated incidents.	Policy/Governance	4.611 (0.501)
A2. Modern slavery and economic exploitation risks appear on the university's strategic and operational risk registers with clear controls and owners.	Policy/Governance	4.555 (0.511)
A3. We review how procurement, international partnerships, recruitment, and estates operations may reproduce unequal power relations that heighten the risk of economic exploitation.	Operations/Practices	3.333 (0.485)
A4. We assess how cross-departmental policies (e.g. HR, procurement, international, research) reinforce, rather than dilute, anti-exploitation aims.	Operations/Practices	3.388 (0.607)
A5. We map dependencies, authority, and worker voice within priority supply chains to understand how power circulates and how economic exploitation risks arise.	Evidence/Knowledge-Voice/Participation	3.444 (0.615)
A6. Our planned actions to address modern slavery deal with underlying structural drivers as well as day-to-day practices.	Operations/Practices	4.333 (0.485)
A7. We monitor how employment practices (e.g., casualised contracts, agency work, subcontracting) may create or worsen risks of economic exploitation.	Operations/Practices	3.944 (0.725)
A8. Our modern slavery policies explicitly link to global goals on poverty reduction (SDG 1), decent work (SDG 8), and reduced inequalities (SDG 10).	SDG Alignment	4.500 (0.514)
A9. When assessing economic exploitation risks, we consider how university operations may obstruct or support progress towards peace, justice, and strong institutions (SDG 16).	SDG Alignment	4.555 (0.511)
A10. We review how our financial and partnership decisions (suppliers, collaborations, investments) align with anti-exploitation commitments and SDGs.	Policy/Governance-SDG Alignment	4.555 (0.511)

Notes: Observations from 18 UK universities. The response options range from strongly disagree to strongly agree. The principle builds on and reflects the Pluralistic Framework for the Study of Economic Exploitation. The theme Policy/Governance (P) relates to strategies, leadership, commitments, and structures. The theme Operations/Practices (O) refers to procurement, human resources, supply chains, and day-to-day activities. The theme Evidence/Knowledge (E) covers data, audits, research, and monitoring. The theme Voice/Participation (V) concerns worker and survivor voice, staff feedback, and community engagement. The theme SDG Alignment (S) captures explicit links to the Sustainable Development Goals and the 2030 Agenda.

Appendix

Table A2. Modern Slavery Reflexive Assessment Scale. Principle Two: Epistemic Pluralism and Situated Knowledge

Items	Themes of Institutional Engagement Related to Anti-Modern Slavery	Mean (standard deviation)
B1. Our approach to modern slavery benefits from input across academic disciplines (law, sociology, anthropology, political science, economics).	Evidence/Knowledge	4.555 (0.511)
B2. When making operational decisions on modern slavery risks, we draw on professional expertise (legal, financial, HR, procurement, estates) alongside cost or compliance considerations.	Evidence/Knowledge - Policy/Governance	4.277 (0.669)
B3. Survivor and worker perspectives are directly used to shape the university's responses to modern slavery and exploitation.	Voice/Participation	2.666 (0.594)
B4. We involve affected groups or their representatives (e.g., workers, unions, community organisations) in setting our anti-exploitation priorities and actions.	Voice/Participation	4.388 (0.501)
B5. In decisions about modern slavery, we give equal weight to practice-based insights and qualitative evidence as to quantitative data.	Evidence/Knowledge	4.500 (0.514)
B6. We regularly act on feedback from staff who work directly with suppliers, students, or communities about economic exploitation risks.	Voice/Participation	4.277 (0.669)
B7. Perspectives from historically marginalised communities, including those in the Global South, are explicitly drawn on to guide our modern slavery work.	Voice/Participation-SDG Alignment	2.833 (0.985)
B8. We engage with knowledge produced by Global South partners and minoritised groups when shaping contributions to the SDGs.	SDG Alignment	2.777 (0.808)
B9. Our education and research strategies on modern slavery explicitly contribute to inclusive and equitable education (SDG 4) and global partnerships (SDG 17).	SDG Alignment	4.555 (0.511)
B10. Advisory groups, forums, or other mechanisms ensure that worker, student, and community perspectives feed into ongoing modern slavery strategy design.	Policy/Governance - Voice/Participation	4.555 (0.511)

Notes: Observations from 18 UK universities. The response options range from strongly disagree to strongly agree. The principle builds on and reflects the Pluralistic Framework for the Study of Economic Exploitation. The theme Policy/Governance (P) relates to strategies, leadership, commitments, and structures. The theme Evidence/Knowledge (E) covers data, audits, research, and monitoring. The theme Voice/Participation (V) concerns worker and survivor voice, staff feedback, and community engagement. The theme SDG Alignment (S) captures explicit links to the Sustainable Development Goals and the 2030 Agenda.

Appendix

Table A3. Modern Slavery Reflexive Assessment Scale. Principle Three: Intersectional and Decolonial Analysis

Items	Themes of Institutional Engagement Related to Anti-Modern Slavery	Mean (standard deviation)
C1. Risk assessments for modern slavery consider how gender, race, migration status, disability, and class shape vulnerability.	Evidence/Knowledge	4.277 (0.669)
C2. We assess whether supplier relationships reflect unequal global power dynamics, and address these in procurement and partnership requirements.	Operations/Practices	2.777 (0.732)
C3. Staff training explicitly addresses how racism, sexism, ableism, and other social structures increase the risk of exploitation.	Policy/Governance	2.944 (0.639)
C4. Procurement and supplier engagement processes reflect fair work expectations in both Global South and UK contexts.	Operations/Practices	2.666 (0.766)
C5. When exploitation is identified, we prioritise protecting and improving conditions for affected workers before considering disengagement, with safeguards in place.	Operations/Practices	3.166 (0.618)
C6. Monitoring data on modern slavery are disaggregated by characteristics (e.g., gender, migration status, disability) to identify unequal impacts and guide corrective action.	Evidence/Knowledge	2.555 (0.704)
C7. We examine how overlapping identities (e.g., migrant women, disabled workers) create unique patterns of vulnerability to exploitation.	Evidence/Knowledge - Voice/Participation	4.388 (0.777)
C8. Our risk analysis highlights how identity factors (gender, race, migration, disability) intersect to block progress on gender equality (SDG 5) and decent work (SDG 8).	SDG Alignment	4.222 (0.808)
C9. We review whether our supply chains contribute to unequal outcomes between the Global North and South, and adjust practices to support reduced inequalities (SDG 10) and peace, justice, and strong institutions (SDG 16).	Operations/Practices - SDG Alignment	2.277 (0.826)
C10. Our collaborations and partnerships are designed to avoid exploitative or one-sided arrangements and promote equitable outcomes.	Policy/Governance - Operations/Practices	4.500 (0.785)

Notes: Observations from 18 UK universities. The response options range from strongly disagree to strongly agree. The principle builds on and reflects the Pluralistic Framework for the Study of Economic Exploitation. The theme Policy/Governance (P) relates to strategies, leadership, commitments, and structures. The theme Operations/Practices (O) refers to procurement, human resources, supply chains, and day-to-day activities. The theme Evidence/Knowledge (E) covers data, audits, research, and monitoring. The theme Voice/Participation (V) concerns worker and survivor voice, staff feedback, and community engagement. The theme SDG Alignment (S) captures explicit links to the Sustainable Development Goals and the 2030 Agenda.

Appendix

Table A4. Modern Slavery Reflexive Assessment Scale. Principle Four: Normative Commitment to Justice, Equity, and Transformation

Items	Themes of Institutional Engagement Related to Anti-Modern Slavery	Mean (standard deviation)
D1. The university's public commitments on modern slavery emphasise dignity, equity, and structural change, rather than compliance alone.	Policy/Governance	4.555 (0.615)
D2. Senior leaders consistently communicate expectations on modern slavery and model accountability in their actions.	Policy/Governance	4.444 (0.783)
D3. Decisions give meaningful weight to human rights even when this increases financial or operational costs.	Policy/Governance	3.555 (0.511)
D4. A survivor-centred approach guides our responses, including incident management, grievance procedures, and remedies.	Voice/Participation - Policy/Governance	2.944 (0.725)
D5. We have clear accountability mechanisms, safe reporting routes, and independent escalation options for modern slavery concerns.	Policy/Governance	2.555 (0.921)
D6. Dedicated resources (budget, staff time) are allocated to deliver sustained improvements in anti-exploitation work.	Policy/Governance - Operations/Practices	3.000 (0.685)
D7. Our actions aim not only to ensure fair treatment but also to drive structural change in labour conditions and supply chains.	Operations/Practices	2.777 (0.646)
D8. Public commitments on modern slavery are framed as part of advancing social justice and poverty eradication (SDG 1).	SDG Alignment	4.333 (0.766)
D9. Decisions are explicitly assessed for their contribution to gender equality (SDG 5), decent work (SDG 8), and reduced inequalities (SDG 10).	SDG Alignment	4.055 (0.725)
D10. We prioritise the needs of the most vulnerable and those 'furthest behind' in line with the 2030 UN Sustainable Development Agenda.	SDG Alignment - Policy/Governance	4.500 (0.707)

Notes: Observations from 18 UK universities. The response options range from strongly disagree to strongly agree. The principle builds on and reflects the Pluralistic Framework for the Study of Economic Exploitation. The theme Policy/Governance (P) relates to strategies, leadership, commitments, and structures. The theme Operations/Practices (O) refers to procurement, human resources, supply chains, and day-to-day activities. The theme Voice/Participation (V) concerns worker and survivor voice, staff feedback, and community engagement. The theme SDG Alignment (S) captures explicit links to the Sustainable Development Goals and the 2030 Agenda.

Appendix

Table A5. Modern Slavery Reflexive Assessment Scale. Principle Five: Methodological Diversity and Grounded Inquiry

Items	Themes of Institutional Engagement Related to Anti-Modern Slavery	Mean (standard deviation)
E1. In addressing modern slavery, we use a mix of methods including data analysis, audits, worker-voice tools, interviews, and document reviews.	Evidence/Knowledge	4.444 (0.704)
E2. Our risk assessments for modern slavery are historically informed and sensitive to local context.	Evidence/Knowledge	4.277 (0.669)
E3. We pilot anti-exploitation interventions, evaluate the results and refine our approach accordingly.	Evidence/Knowledge - Operations/Practices	2.055 (0.872)
E4. Supplier assessments for modern slavery risks combine formal checks (e.g., audits, documents) with direct engagement (e.g., worker interviews, community dialogue).	Operations/Practices - Evidence/Knowledge	2.444 (0.783)
E5. Civil society and community organisations are involved in monitoring or evaluating our modern slavery work where appropriate.	Voice/Participation - Evidence/Knowledge	4.166 (0.707)
E6. Our approaches to modern slavery are tailored to the risks of each sector and region, not applied as one-size-fits-all.	Operations/Practices	4.388 (0.697)
E7. Knowledge from lived experience and worker voice is treated as equally valid as audit findings or data analysis in modern slavery decisions.	Voice/Participation - Evidence/Knowledge	4.500 (0.618)
E8. Evaluations of our modern slavery work track contributions to sustainable procurement and responsible consumption (SDG 12).	SDG Alignment - Evidence/Knowledge	4.166 (0.857)
E9. Piloted interventions are assessed for relevance to decent work (SDG 8) and, where appropriate, innovation and infrastructure (SDG 9).	SDG Alignment - Evidence/Knowledge	3.277 (0.669)
E10. Findings from modern slavery evaluations are shared openly and transparently to support collective learning and SDG progress.	SDG Alignment - Evidence/Knowledge	2.722 (0.460)

Notes: Observations from 18 UK universities. The response options range from strongly disagree to strongly agree. The principle builds on and reflects the Pluralistic Framework for the Study of Economic Exploitation. The theme Operations/Practices (O) refers to procurement, human resources, supply chains, and day-to-day activities. The theme Evidence/Knowledge (E) covers data, audits, research, and monitoring. The theme Voice/Participation (V) concerns worker and survivor voice, staff feedback, and community engagement. The theme SDG Alignment (S) captures explicit links to the Sustainable Development Goals and the 2030 Agenda.

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Table A6. Modern Slavery Reflexive Assessment Scale. Principle Six: Engaged Scholarship and Evidence-Informed Policymaking

Items	Themes of Institutional Engagement Related to Anti-Modern Slavery	Mean (standard deviation)
F1. We collaborate with academic units and external experts to strengthen practice and policy on modern slavery.	Policy/Governance - Evidence/Knowledge	4.166 (0.785)
F2. Our research and teaching contribute to sector guidance or public policy on modern slavery and exploitation.	Evidence/Knowledge	4.388 (0.607)
F3. Students and staff engage in modules, projects, or campaigns that build understanding of modern slavery.	Voice/Participation - SDG Alignment	4.444 (0.783)
F4. Our Modern Slavery Statement uses clear evidence, Key Performance Indicators, and progress tracking rather than narrative description only.	Policy/Governance - Evidence/Knowledge	3.222 (0.808)
F5. We participate in sector initiatives and frameworks that enable collective leverage with suppliers against exploitation.	Operations/Practices - Policy/Governance	2.944 (0.725)
F6. Lessons from our modern slavery work are shared with peer institutions, and we adapt based on external benchmarks.	Operations/Practices - Evidence/Knowledge	2.555 (0.855)
F7. We treat modern slavery scholarship as contributing to collective mobilisation and democratic accountability, not only compliance.	Policy/Governance	4.388 (0.697)
F8. Teaching and research on modern slavery explicitly highlight contributions to SDGs (e.g., SDG 4 Quality Education, SDG 8 Decent Work, SDG 17 Partnerships).	SDG Alignment	4.111 (0.758)
F9. We work with governments, NGOs, and international partners to improve protections for workers and institutions, supporting reduced inequalities (SDG 10) and peace, justice and strong institutions (SDG 16).	SDG Alignment - Policy/Governance	3.333 (0.685)
F10. We track and share how our modern slavery scholarship and partnerships contribute to the university's wider SDG reporting and civic engagement.	SDG Alignment - Evidence/Knowledge	4.111 (0.758)

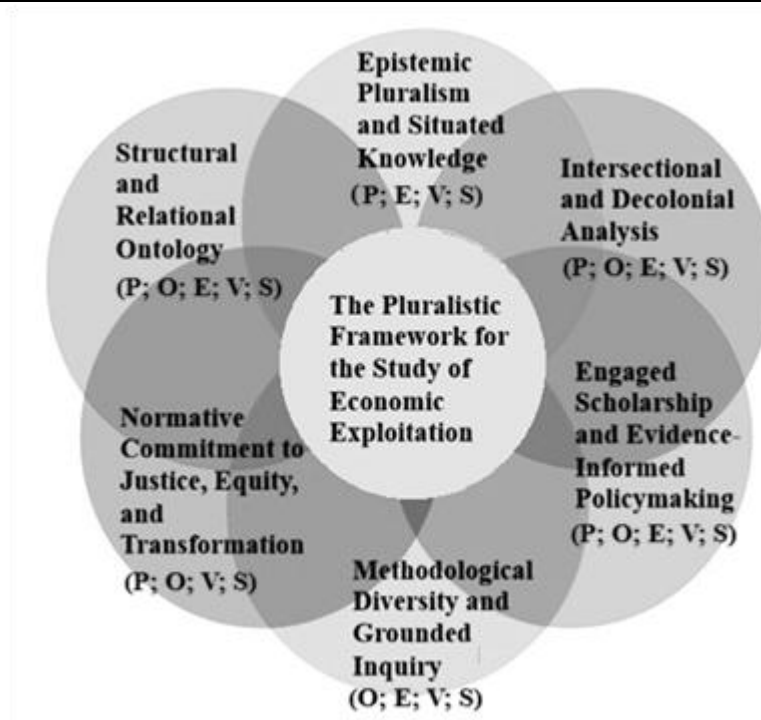
Notes: Observations from 18 UK universities. The response options range from strongly disagree to strongly agree. The principle builds on and reflects the Pluralistic Framework for the Study of Economic Exploitation. The theme Policy/Governance (P) relates to strategies, leadership, commitments, and structures. The theme Operations/Practices (O) refers to procurement, human resources, supply chains, and day-to-day activities. The theme Evidence/Knowledge (E) covers data, audits, research, and monitoring. The theme Voice/Participation (V) concerns worker and survivor voice, staff feedback, and community engagement. The theme SDG Alignment (S) captures explicit links to the Sustainable Development Goals and the 2030 Agenda.

Appendix

Table B0. Mapping the principles of the Pluralistic Framework for the Study of Economic Exploitation to their theoretical foundations and empirical operationalisation in the Modern Slavery Reflexive Assessment Scale

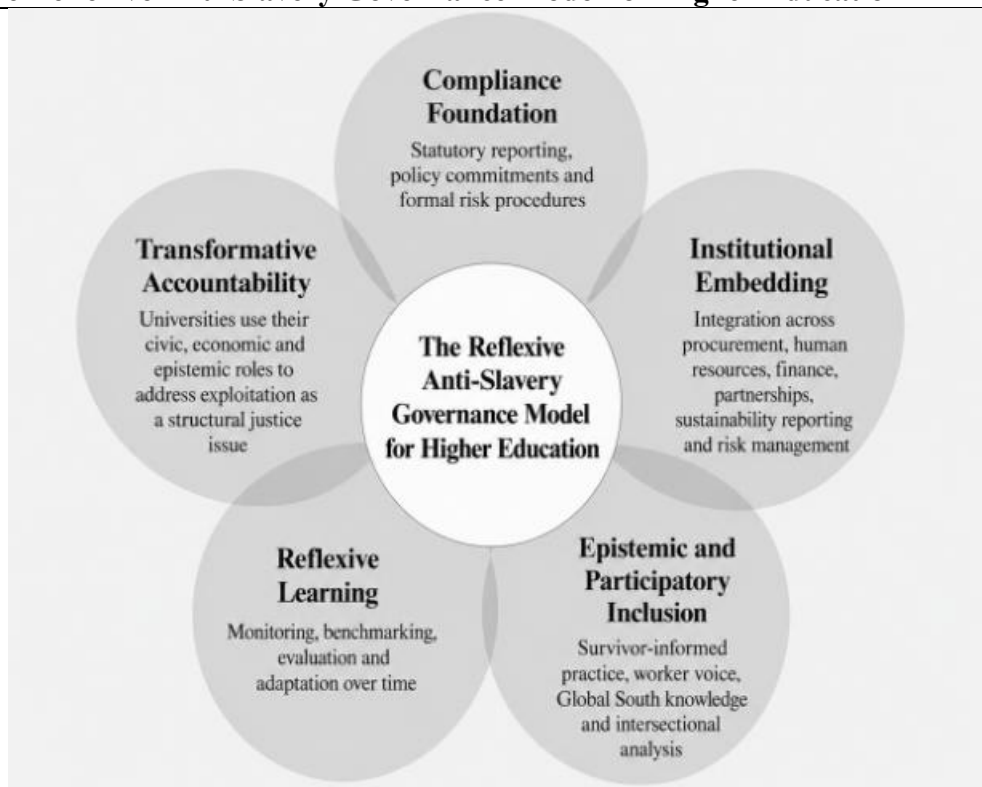
Principles of the Pluralistic Framework for the Study of Economic Exploitation	Core Analytical Focus (examples)	Themes of Institutional Engagement Related to Anti-Modern Slavery (examples)	Illustrative Indicators (examples)
Principle I: Structural and relational ontology	Exploitation as systemic, historically produced, and embedded in power relations	Policy/Governance; Operations/Practices; SDG Alignment	Risk registers include exploitation; supply-chain power mapping; links to SDGs 1, 8, 10, and 16 (A1–A10)
Principle II: Epistemic pluralism and situated knowledge	Valuing interdisciplinary expertise and lived experience	Evidence/Knowledge; Voice/Participation; Policy/Governance	Use of survivor and worker voice; interdisciplinary input; Global South perspectives (B1–B10)
Principle III: Intersectional and decolonial analysis	How overlapping inequalities and global hierarchies shape vulnerability	Operations/Practices; Policy/Governance; Evidence/Knowledge	Disaggregated data; identity-sensitive risk analysis; fair Global South partnerships (C1–C10)
Principle IV: Normative commitment to justice, equity, and transformation	Embedding justice-oriented values beyond compliance	Policy/Governance; Operations/Practices; Voice/Participation	Survivor-centred approaches; leadership accountability; SDG-linked justice commitments (D1–D10)
Principle V: Methodological diversity and grounded inquiry	Using plural, context-sensitive methods to assess risk and impact	Evidence/Knowledge; Operations/Practices; Voice/Participation	Mixed-method risk assessments; worker interviews; piloted interventions (E1–E10)
Principle VI: Engaged scholarship and evidence-informed policymaking	Linking research, teaching, and practice to policy and SDGs	Evidence/Knowledge; Policy/Governance; Voice/Participation	Policy-relevant research; student engagement; collective action and benchmarking (F1–F10)

Figure 1. The Pluralistic Framework for the Study of Economic Exploitation and Its Operationalisation for Modern Slavery



Notes: The Pluralistic Framework for the Study of Economic Exploitation is an application of Drydakis (2026a) Pluralistic Framework for the Study of Socioeconomic Phenomena. The figure presents a non-hierarchical, overlapping schematic in which economic exploitation is positioned at the centre as the foundational condition underpinning modern slavery. Six interrelated principles surround and intersect with this core, illustrating how structural, epistemic, intersectional, normative, methodological, and policy-engaged dimensions jointly constitute the analysis of exploitation. The overlapping circles indicate mutual reinforcement and co-constitution, rather than linear causality or discrete analytical domains. The framework is operationalised for the study of modern slavery through the Modern Slavery Reflexive Assessment Scale, with each principle reflecting critical themes of institutional engagement related to anti-modern slavery. For instance, the principle Structural and Relational Ontology reflects the following institutional engagement themes: Policy/Governance; Operations/Practices; Evidence/Knowledge; Voice/Participation; and Sustainable Development Goals Alignment. The theme Policy/Governance (P) relates to strategies, leadership, commitments and structures. The theme Operations/Practices (O) refers to procurement, human resources, supply chains and day-to-day activities. The theme Evidence/Knowledge (E) covers data, audits, research and monitoring. The theme Voice/Participation (V) concerns worker and survivor voice, staff feedback and community engagement. The theme SDG Alignment (S) captures explicit links to the Sustainable Development Goals and the 2030 Agenda.

Figure 2. The Reflexive Anti-Slavery Governance Model for Higher Education



Notes: The figure presents the Reflexive Anti-Slavery Governance Model for Higher Education. The five dimensions are interrelated and developmental, without implying a fixed sequence of stages. Universities may develop unevenly across dimensions, with progress shaped by institutional context, leadership commitment, resources, evidence use and ongoing learning. The model synthesises the empirical pattern identified in the study, showing how anti-slavery governance can develop beyond disclosure-based compliance towards embedded, participatory, reflexive and justice-oriented institutional practice.