



ABERYSTWYTH UNIVERSITY MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2021

SUMMARY

We are committed to improving our practices to combat the exploitation caused by slavery and human trafficking. To achieve this, we are committed to understanding modern slavery risks and ensuring that there is no modern slavery in our own business and supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (as subsequently amended) and constitutes our slavery and human trafficking statement for the financial year ending 31/07/2021. In addition, this statement sets out the University's undertakings in respect of the Welsh Government Code of Practice on Ethical Employment in Supply Chains.

INTRODUCTION FROM THE UNIVERSITY COUNCIL

Modern slavery is a crime and the failure of the State to prevent it, and to protect its victims is a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the restriction of a person's liberty by another to exploit them for personal or commercial gain.

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ORGANISATIONAL STRUCTURE

In accordance with Aberystwyth University's Supplementary Royal Charter, the Council is "the supreme governing body of the University" and is responsible for "determining the University's strategic direction and for the conduct of the University's financial, administrative and other affairs, in accordance with its objects".

The executive management of the University on a day-to-day basis is the responsibility of the Vice-Chancellor – the institution's chief academic, administrative and accounting officer – who, whilst retaining strategic oversight, delegates several operational functions to the appropriate officers.

OUR SUPPLY CHAINS

The University has non-pay expenditure of over £44m in goods, services and works. The University meets its needs in a way that achieves value for money on a whole life basis in terms of generating benefits not only for the organisation, but also for society and the economy, whilst minimising damage to the environment.

The University's supply chains mainly fall under five 'super-categories', which are:

- Laboratory Consumables and Equipment
- Library Resources
- Professional Service
- ICT Equipment and Services
- Estates Goods, Services and Works.

The principal categories which carry material risks are office supplies, laboratory consumables, ICT equipment and some estates services, such as cleaning services outsourced from time to time.

Aberystwyth University is a member of the Higher Education Purchasing Consortium Wales (HEPCW). HEPCW works effectively alongside its counterpart UK Universities Purchasing Consortia and national groups, with which it enjoys progressive and successful relationships.

The joint contracting programme provides a comprehensive and mature collaborative portfolio, which includes some of the high-risk categories listed above.

Increasing numbers of our suppliers in these higher-risk categories have committed to the Base Code of the Ethical Trading Initiative (ETI) and the UK Universities Purchasing Consortia are working to ensure that the remaining suppliers in these categories to join them. The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice, requiring that:

1. Employment is freely chosen;
2. Freedom of association and the right to collective bargaining are respected;
3. Working conditions are safe and hygienic;
4. Child labour are not used;
5. Living wages are paid;
6. Working hours are not excessive;
7. No discrimination is practised;
8. Regular employment is provided;
9. No harsh or inhumane treatment is allowed;
10. A written policy is produced on ethical employment;
11. A written policy is produced to support whistle-blowers;
12. Trade union membership is supported.

ICT Equipment

Aberystwyth University participates in several ICT equipment collaborative purchasing agreements.

Through these collaborative purchasing agreements, the University supports the principles of Electronics Watch, an independent monitoring organisation working to achieve respect for labour rights in the global electronics industry through socially responsible public purchasing in Europe. We work with our contracted suppliers to implement and commit to new monitoring regimes where corporate codes of conduct and social auditing policies and practices are failing in their transparency and effectiveness.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Considering the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free, we will review our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues. Emerging government policy on ethical supply chains will also be considered by the University.

Our workplace policies and procedures will demonstrate our commitment to acting ethically and with integrity in all our business relationships, as well as to implementing and enforcing effective systems and controls to ensure that neither slavery nor human trafficking are taking place anywhere in our supply chains.

DUE DILIGENCE PROCESSES DUE DILIGENCE PROCESSES AND THEIR EFFECTIVENESS

We have undertaken initiatives to put systems in place to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains
- Protect whistle blowers.

The University has identified principal risk categories in our areas of expenditure and implemented processes to ensure that all new procurement exercises require all potential suppliers to confirm that they operate in accordance with the requirements of the modern Slavery Act (2015).

Furthermore, the University has taken steps to fully implement the voluntary living wage and has become an accredited Living Wage employer in 2018.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our organisation, we have raised awareness of modern slavery and human rights abuses amongst our staff. Procurement staff have completed 'Ethical Procurement and Supply' on-line training.

Code of Practice: Ethical Employment in Supply Chains

In 2017, the Welsh Government launched the Code of Practice on Ethical Employment in Supply Chains to ensure that all public sector organisations are taking action to eradicate unlawful and unethical employment practices, and to ensure all workers at every stage of the supply chain are treated fairly. The University has signed-up to this Code of Practice, with the intention to comply with 12 commitments designed to eliminate modern slavery and support ethical employment practices.

An action plan has been developed to address the 12 commitments contained in the Code of Practice.

PERFORMANCE AGAINST OUR GOALS FOR 2020-21

During 2020-21, which was a difficult year in the context of the impacts of exit from the EU and the Coronavirus Pandemic, we nevertheless made progress against stated goals; this section highlights those successes:

Undertake further work in the overseas supply arena to further categorise compliance checks of non-UK suppliers against Modern Slavery legislation, consistent with the legal requirements applicable. This work will further expand and build upon existing input and, working with our sector framework managers, will categorise suppliers by regularity of trading history with the University commensurate to the applicability of the legislation to those suppliers consistent with their G20 status and corresponding legal position.

In the reporting period, we have concentrated on expanding our knowledge of our strategic suppliers, who are almost exclusively UK based. Nevertheless, we have not lost sight of the need to scrutinise the credentials of our regular overseas suppliers. As such, we have engaged the services of an academic expert in Modern Slavery matters at Aberystwyth University. The Modern Slavery & Human Trafficking Statement has been reviewed with their help, as have the goals for 2021/22. Our goals for 2021/22 are to continue this engagement with our academic expert such that we can be guided towards a best-in-class response to our overseas supplier portfolio.

Develop a contracts register/management system to assist with record keeping, recording the employment practices of our high-risk suppliers, and providing a system prompt to ensure periodic reviews. We intend to maximise use of the Welsh Government funded e-tender system contracts management module wherever possible to deliver this piece of work.

During 2020/21, the University has developed a procurement 'pipeline' which represents recognised best procurement practice in terms of acquisition forward planning. The pipeline includes data highlighting existing contracts and planned new purchases and represents a robust first University contract register. Further development plans are reflected below in our goals for 2021/22 outlined below.

Further enhance the requirement for mandatory refresher training among all staff across the institution with responsibilities for recruitment and procurement activities.

During the reporting period, we have sought to develop software solutions to monitor uptake of staff on refresher training courses. This remains in progress.

OUR GOALS FOR 2021-22

The University is committed to better understanding its supply chains and working towards greater transparency and responsibility towards people working within them. To achieve this, we will:

- Automate the contracts register. We will undertake a full strategic review of marketplace solutions in terms of various online solutions, including the full automation of a contracts register/ contracts management systems.
- Develop our engagement with NETpositive to increase the number of suppliers registered with the service and promote sustainability and social value issues throughout the supply chain. Secondly, to

develop an interface between the selected contracts register/ contracts management system and NETpositive Futures for sustainability data.

- Further promote the requirement for Modern Slavery training and implement a system which allows monitoring and identification of refresher training requirements.
- Take further steps to identify overseas suppliers that should be included in on-going monitoring and engagement, taking advice from Aberystwyth University academic experts.