ABERYSTWYTH UNIVERSITY MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2022

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 31/07/2022. 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.

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 31/7/2022.

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 £38.5m on 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 been an accredited Living Wage employer since 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. To date 9 commitments have been completed with the following partially completed:

 • Expect our suppliers to sign up to this Code of Practice to help ensure that ethical employment practices are carried out throughout the supply chain

 • Monitor the employment practices of our high risk suppliers, making this a standard agenda item for

all contract management meetings / reviews

- Encourage our suppliers based overseas to pay a fair wage to all staff and to ensure that staff working in the UK are paid at least the minimum wage.

PERFORMANCE AGAINST OUR GOALS FOR 2021-22

The year has brought additional challenges for the Procurement team, particularly managing the additional procurement administration emanating from the UK's withdrawal from the European Union, as well as managing the ongoing challenges arising from the Coronavirus Pandemic. Nevertheless, the University has made progress against stated goals; this section highlights those successes:

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.

A full strategic review of marketplace solutions was completed. Following a full strategic review of available marketplace solutions completed during 2021/22, contracts register system has been selected and implementation work is ongoing and is reflected in the 2022-23 goals noted below.

Develop our engagement with NETPositive Futures 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.

Full comparison of current supplier database with NETPositive Futures own database was completed to identify any AU suppliers not currently registered. All suppliers with annual spend over £100K were contacted and prompted to register with NETPositive Futures. Contracts advertised on our e-tender system also now contain wording detailing an expectation from the University that successful suppliers should register with NETPositive Futures, in order to increase uptake within our supply base. The engagement with NETPositive Futures is an ongoing task and has been included in our goals for 2022-23.

Further promote the requirement for Modern Slavery training and implement a system which allows monitoring and identification of refresher training requirements.

Modern Slavery training has been promoted via an external training course supplied by the Higher Education Procurement Association (HEPA). As the training course was externally held, monitoring and identification of refresher training was not possible. However, the Procurement Manager has engaged with colleagues working on the Procurement Enhancement Project to identify potential technological opportunities for monitoring. We will explore the potential to link monitoring to employee's annual individual appraisal review. Opportunity assessments are on-going and will form part of the goals for 2022-23.

Take further steps to identify overseas suppliers that should be included in on-going monitoring and engagement, taking advice from Aberystwyth University academic experts.

Work is progressing to implement a market intelligence solution in order to have improved data on national and international supply markets. Once a market intelligence solution is in place, work will commence to gain a greater understanding of the supplier database as a whole and advice will be sought from Aberystwyth academic experts on which suppliers to target initially.

OUR GOALS FOR 2022-23

In 2022-23 we will build upon the work undertaken in 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:

- Implement the contracts register and transfer all current contracts to the new system.

- Continue to develop our engagement with NETPositive Futures by running an annual comparison of our supplier database and identifying any gaps. Increase the targeted supplier pool by contacting all suppliers not currently registered with NETPositive Futures who have an annual spend of over £50K with the University.

- Implement Modern Slavery training monitoring and a system to identify when refresher training is due.

- Increase knowledge of suppliers as a whole with specific targeting of identified international suppliers where modern slavery concerns are raised through use of market intelligence solution. 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.