

## **ABERYSTWYTH UNIVERSITY MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2020**

### **SUMMARY**

We are committed to improving our practices to combat slavery and human trafficking. In order 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 and constitutes our slavery and human trafficking statement for the financial year ending 31/07/2020. 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 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 deprivation of a person's liberty by another in order 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 to the organisation, but also to 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 shall not be used;
5. Living wages are paid;
6. Working hours are not excessive;
7. No discrimination is practised;
8. Regular employment is provided; and
9. No harsh or inhumane treatment is allowed.

### **ICT Equipment**

Aberystwyth University participates in a number of 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.

In light of 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 and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## **DUE DILIGENCE PROCESSES DUE DILIGENCE PROCESSES AND THEIR EFFECTIVENESS**

We have undertaken initiatives to identify and mitigate and 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 exercised require all potential suppliers to confirm 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 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 and have circulated details University wide of appropriate training courses for 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 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 2019-20**

During 2019-20 we made progress against stated goals; this section highlights those successes.

- *The University will enhance existing sector level collaborative Modern Slavery Act related risk assessments for key suppliers. It will accomplish this by utilising external software databases made available by through Welsh Government, to further interrogate the Modern Slavery credentials of its suppliers at a 'local' level.*

Completed. In late 2019, the University secured the services of an undergraduate third year Business and Management student on a short-term placement via the EU funded 'Go Wales' programme who undertook basic data interrogation work access on the Welsh Government database. We now also have basic data confirming the modern slavery statement credentials of all our suppliers via the external software database, which we can extrapolate in any given reporting period, whilst also providing valuable insight into Modern Slavery legislation for a final year student to enhance their learning and provide valuable work experience.

- *The University will build upon its assessment of overseas suppliers to seek maximum compliance with related aspects of its Code of Practice action plan.*

In progress. A 'snapshot' assessment was made during 2019/20 of our top 50 overseas suppliers in terms of financial risk, also providing a data source to establish whether an overseas entity has links to the Modern

Slavery Act considerations. This work to date constitutes circa 50% of the work profile associated with this task, with the remainder noted below as 2021/21 goals. Some G20 countries have recently passed legislation intended to reduce the impact of modern slavery on supply chains; our work here also aims to capture this, enhancing our supply market understanding.

- *The University will undertake a comprehensive assessment of its Code of Practice to ensure compliance in all key areas.*

Good progress. Work on our code of practice has continued and further developments in the year have included:

- Sector training guidance on modern slavery and related considerations have been made available to all University employees. Training in Ethical Employment and Recruitment Practices has been undertaken by staff involved in the recruitment process. Staff with significant responsibilities for procurement have been required to complete Modern Slavery for Procurement training.
- Monitoring the take up of Modern Slavery related Code of Practice commitments amongst devolved purchasers and the central team, which is now underway.

#### **OUR GOALS FOR 2020-21**

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

- Undertake further work in the overseas supply arena to further categorise compliance checks of non-UK suppliers against Modern Slavery legislation, consistent with applicable legal jurisdictions. 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.
- Further enhance the requirement for mandatory refresher training among all staff across the institution with responsibilities for recruitment and procurement activities.
- 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 for 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.



Chair of Council

Aberystwyth University

Date: 26/11/2020