



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

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.

As required by the Modern Slavery Act (2015) the University has drafted a slavery and human trafficking statement for the financial year ending 31/7/2019, which is reproduced below:

ABERYSTWYTH UNIVERSITY MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

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.

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 31/7/2019.

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 £27m 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 Services
- 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 falling 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 continually review our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues. Welsh Government policy on ethical supply chains are also being 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 AND THEIR EFFECTIVENESS

To reiterate, during 2018-19 we undertook 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).

In 2017-18, the University took steps to fully implement the voluntary living wage and become an accredited Living Wage employer.

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 are raising awareness of modern slavery and human rights abuses amongst our staff and deliver appropriate training. Procurement staff are working towards completing the Chartered Institute of purchasing and Supply (CIPS) 'Ethical Procurement and Supply' on-line training, or equivalent.

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 2018-19

During 2018-19 we achieved significant progress against stated goals; this section highlights those successes.

- Ensure effective due diligence processes and risk assessments are fully embedded into our procurement processes:

Purchasing managers across the University are aware of the need to take due cognisance of the Code of Practice and Modern Slavery Act matters when drafting tender documents. This has been achieved through our tender control sheet – a step by step checklist for tendering activities. We have further enhanced this

during 2018/19 by ensuring dedicated commodity specialist support for expenditure in the major risk category areas of ICT equipment and Estates Goods, services and Works.

- Develop an Action Plan to address the 12 commitments contained in the Code of Practice on Ethical Employment in Supply Chains:

The University has developed a Code of Practice Action Plan. During 2018, areas that have received further development include more staff training on Modern Slavery Act matters and access to an externally funded software package. This provides the University with increased visibility on the Modern Slavery Act credentials of its key suppliers.

During 2018/19, we have identified key overseas suppliers (primarily in terms of financial risk status) which will inform a further work package to also profile these same suppliers in terms of Modern Slavery Act risks.

- Develop and roll out Modern Slavery awareness training for staff involved in procurement and those involved in managing high-risk spend categories:

Modern Slavery awareness training was extended to Human Resources, Estates Facilities & Residences and Information Services teams during 2018/19 and all central Procurement staff completed the training during the same period.

- Work collaboratively to improve better understand our supply chains and work towards greater transparency and responsibility towards people working in them:

Collaborative working has continued during 2018/19 at regional consortia level (HEPCW) and AU remains an active member of the Modern Slavery Act working group.

OUR GOALS FOR 2019-20

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:

- 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.

- The University will build upon its assessment of overseas suppliers to seek maximum compliance with related aspects of its Code of Practice action plan.
- The University will undertake a comprehensive assessment of its Code of Practice to ensure compliance in all key areas.

A handwritten signature in black ink, appearing to read 'E. Roberts', with a stylized, cursive script.

Chair of Council
Aberystwyth University
Date: 25/11/2019