

Modern Slavery Statement 2023/24

Introduction

At Aston University our society is one of the key beneficiaries of our strategy. As part of this, we continue to be highly committed to combatting slavery and human trafficking and delivering our obligations under the Modern Slavery Act 2015.

Our Structure and Supply Chains

Aston University is a research-led university known for its world-class teaching quality and strong links to industry, government and commerce. Aston employs over 2,100 staff in the UK with annual turnover of approximately £225 million. The University has one active subsidiary company, Conference Aston Limited.

The University comprises three colleges:

- Business and Social Sciences (BSS)
- Engineering and Physical Sciences (EPS)
- Health and Life Sciences (HLS)

The three colleges are supported by a number of professional services directorates.

In 2023/24, the University spent approximately £98m on procured goods, works and services. The University's supply chains fall within the following high-level category groupings by which its procurement function is organised:

- Construction (inc. related professional services)
- Facilities Management (hard and soft) including catering, utilities and vehicles
- Digital Services
- Professional Services
- Scientific, Technical, Engineering, Medical and Educational (STEMEd) equipment products and services

Our Policies in relation to Slavery and Human Trafficking

The University recognises its responsibility to demonstrate a fully compliant approach to ethical practice. Aston's [2030 Strategy](#) sets out 'Integrity' as one of the University's core values: by valuing honesty, trust, fairness and ethical behaviour and always acting with integrity.

Our [Principles and Policies](#) reflect our commitment to acting ethically and with integrity in all our relationships and to implementing and enforcing effective due diligence and contractual compliance.

Our [Anti-Modern Slavery Policy](#) sets out a zero-tolerance policy to slavery and human trafficking for all suppliers/contractors. The University implements this Policy through its Procurement Policy and Procedures.

Due Diligence Processes

The University has Modern Slavery in Procurement guidelines which:

- set out clear and robust due diligence processes to identify and assess potential risk areas in supply chains;
- mitigate the risk of slavery and human trafficking occurring within our supply chains; and
- monitor potential risk areas in supply chains and protect whistleblowers.

These guidelines require us to seek annual re-confirmation of compliance with the Modern Slavery Act from suppliers/contractors delivering high-risk contracts; this is reflected in the Key Performance Indicators (KPIs) set out later in this document.

Risk Assessment and Management

Each of the high-level category groupings above have been considered and the following specific areas identified as typically having a high or medium level of risk of susceptibility to modern slavery and human trafficking. It should be noted that not all contracts in each area will have the same risk level (for example, not every food supply contract will be 'high risk') and the contract risk level will be assessed on a case-by-case basis.

High Risk	Medium Risk
Catering/food supply	Mining/minerals etc.
Construction	Electronics (inc. relevant STEMEd) equipment
Clothing manufacture/cotton	Cleaning, recycling and waste management
Agency workers/security	Hotels/hospitality events
	Warehousing/distribution

All procurement processes above £50,000 require the Procurement Project Team to consider the modern slavery risk for the contract in question, to record this as high, medium or low and take appropriate mitigating action; this is effectively an operational level risk assessment. All pre-existing contracts have been risk assessed with their modern slavery risk rating recorded in the University's contracts register.

For procurement processes below £50,000, the Purchaser is expected to make an assessment of modern slavery risks and where appropriate, consider mitigating action. Purchasers are advised to contact the Procurement team for specific advice and guidance where needed.

The majority of the University's demand for food supply (and many other high/medium risk goods and services) is procured using national/regional framework agreements made available by the Higher Education (or other) purchasing consortia. The University uses consortia procurement arrangements to procure a wide range of products, several of which are sourced from international manufacturers operating in low-cost countries where forms of modern slavery are more likely to be present. The consortia are working to persuade all suppliers in these high-risk categories to commit to the Base Code of the Ethical Trading Initiative (ETI).

A significant proportion of the University's ICT equipment and products are sourced through purchasing consortia. The consortia are members of Electronics Watch and through its membership of the Southern Universities Purchasing Consortium the University is an affiliate member. Contract-monitoring clauses created by Electronics Watch appear in relevant agreements awarded by the consortia and used by the University.

Key Performance Indicators (KPIs) to Measure Effectiveness

During the year, the University has established, and is making progress towards a suite of Key Performance Indicators related to its modern slavery obligations:

Indicator	Target	2023/4
% of eligible staff (defined below) who have completed mandatory anti-modern slavery training	95%	84.4% ¹
% of contracts over £50,000 with modern slavery risk assessment	100%	100%
% of procurement processes over £50,000 with MSA checks	95%	See note 2
% of high-risk contracts where annual reconfirmation has been received	100%	100%

¹ Of the eligible staff, 84.4% have completed either one or both of the HEPA or in-house eLearning courses. The University is taking action to ensure the remaining 'eligible staff' involved with procurement of high-risk contracts undertake the required eLearning imminently.

² Data to measure this KPI will be recorded in the new PCMS (see below) which has recently commenced implementation.

Training on Modern Slavery and Human Trafficking

With the introduction of our new Learning Management System, more tailored modern slavery training has now been made available as part of our "Acting with Integrity" learning series. The list of eligible staff has been expanded to a wider group of procurement stakeholders including contract managers of high and medium risk contracts. Training has been rolled out to all staff so is now available to a much wider group of staff thereby raising awareness and managing risk. Over 800 staff have completed the "Working with Integrity" eLearning, with completion monitored by our Human Resources/Organisational Development (HROD) team.

The KPI for training used above will be reviewed and updated for 2024/25 to reflect these changes.

Aston has a Whistleblowing Policy to ensure that members of the University feel able to raise any concerns. Aston encourages members of the University to speak up promptly if they have any reason to suspect that there has been a breach or potential breach of the University's ethical principles or any other misconduct.

Effectiveness and Further Steps

Building on continuous improvement, the University committed in its 2022/23 Statement to implement a series of improvement. Progress is reported below.

We said we would...	We have...
Implement new Modern Slavery in Procurement Guidelines	These are now documented and being embedded.
Give a modern-slavery risk rating for all new procurements and existing contracts over £50,000	All contracts and procurements over £50,000 have a modern slavery risk rating of high, medium or low.

We said we would...	We have...
Launch tailored modern slavery eLearning to staff using our new Learning Management System	Tailored modern slavery training has now been made available as part of our "Acting with Integrity" learning series to all staff via iLearn.
Implement KPIs to monitor our approach to managing modern slavery risk	Implemented KPIs as stated above. Implementation of the new PCMS (see below) should enable improved measurement in 2024/25.
Seek annual re-confirmation from suppliers on contracts deemed high-risk for modern slavery that they comply with the MSA	Successfully received responses from all applicable suppliers including copies of their modern slavery statements or measures/policies. Additional spot checks on published statements/policies on suppliers' websites.

Looking forward to the 2024/5 financial year, the University will:

- ensure Modern Slavery controls remain in place during the transition to a new Procurement Policy and associated procedures as the requirements of the Procurement Act 2023 comes into force during the year ahead.
- ensure modern slavery is properly reflected when adopting new documentation and systems and considers emerging guidelines and best practice.
- embed the recording of modern slavery actions during procurement and contract management into the new Procurement and Contract Management System (PCMS) to improve our ability to monitor our contractors, undertake and record due diligence on suppliers and seek annual re-confirmation of compliance with the Modern Slavery Act from suppliers delivering high-risk contracts.
- look for opportunities to raise awareness of modern slavery across the university (to both staff and students) through communication aligned with national/global campaigns such as Modern Slavery Awareness Week.
- work to embed Electronics Watch provisions and due diligence in contracts for IT and other electronic equipment.

Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the human trafficking statement for the financial year ending 31 July 2024 for the University and its subsidiaries.

Signature:

Aleks Subic
Vice-Chancellor and Chief Executive

Date: October 2024