

## Modern Slavery Statement 2024/25

### Introduction

At Aston University our society is one of the key beneficiaries of our strategy. The University continues to be 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 2,061 staff (as at 31 July 2025) in the UK with annual turnover of approximately £231 million. The University has one active subsidiary company, Conference Aston Limited.

The University is structured as follows:

- Business and Social Sciences (BSS)
- Engineering and Physical Sciences College (EPS)
- Health and Life Sciences College (HLS) – including Aston Medical School

The colleges are supported by professional services directorates.

In 2024/25, the University spent approximately £110m 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.

Our [Principles and Policies](#) reflect our commitment to act with integrity in all our relationships and to implement and enforce 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 through its Procurement Policy and Procedures.

## A new Charter between the University and Aston Student

During 2024/25 a formal charter between Aston University and the Aston Students' Union was formed, reinforcing shared values of integrity, inclusion, and ethical governance.

This supports the Aston 2030 Strategy, which includes commitments to social responsibility, community empowerment, and ethical leadership.

Importantly, the Charter encourages student engagement in raising awareness of modern slavery risks, promoting the University's commitment to an inclusive and ethical environment that reduces vulnerability to exploitation. The Charter is underpinned by Aston's Ethics Framework, overseen by the Audit and Risk Committee.

The Charter Agreement strengthens Aston's institutional commitment to ethical standards, complementing legal compliance with proactive community and student-led initiatives. It ensures that both governance and operational practices are aligned with the principles of the Modern Slavery Act 2015.

## 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 risk of slavery & 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 year additional questions have been added to our standard procurement and tender questions to capture more information from suppliers who are not subject to the MS Act 2015.

The University follows these processes both in respect of UK and international agreements.

## 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 £60,000 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 £60,000 the Purchaser is expected to assess Modern slavery risks and where appropriate, consider mitigating action. Purchasers are advised to contact the Procurement team for specific advice and guidance where needed. During

this year, the Procurement team has updated templates to remind buyers to consider MS risks for smaller purchases.

Most the University’s demand for high / medium risk goods and services is procured using national / regional framework agreements made available by the Higher Education (or other) purchasing consortia. Catering is now outsourced, but regular checks are carried out. For example, our suppliers confirmed they do not source tomato puree from China followed the recent media coverage concerning food supermarket supply chains.

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. In addition, alerts have been set up within the Procurement team to make quarterly checks ensuring that we have the correct declarations and information from these suppliers.

A significant proportion of the University’s Digital Services 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.

The University has identified a particular risk in respect of its partnerships with international agents. The University is addressing this risk through the implementation of the Agent Quality Framework.

### **Key Performance Indicators (KPIs) to Measure Effectiveness**

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

<b>Indicator</b>	<b>Target</b>	<b>2024/5</b>
% of eligible staff (defined below) who have completed mandatory anti-modern slavery training	95%	86.6% <sup>1</sup>
% of contracts over £60,000 with modern slavery risk assessment	100%	100%
% of procurement processes over £60,000 with MSA checks for ‘New’ High-Risk contracts	95%	100%
% of high-risk contracts where, annual reconfirmation has been received	100%	100%

<sup>1</sup> 86.6% of eligible staff completed either one or both HEPA or in-house eLearning courses. Procurement team have all completed this training.

### **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 1,600 staff have completed the “Acting with Integrity” eLearning, with completion monitored by our Human Resources / Organisational Development (HROD) team. The University is taking action to ensure the remaining ‘eligible staff’ involved with procurement of medium and high-risk contracts undertake the required eLearning and including this training as an objective in the annual performance appraisal.

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 2023/24 statement to implement a series of improvements. Progress is reported below.

<b>We said we would...</b>	<b>We have...</b>
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.	Transitioned in line with the new PA23 whilst complying with the recommended procedures.
Ensure modern slavery is properly reflected when adopting new documentation and systems and considers emerging guidelines and best practice.	Transitioned in line with the new PA23 whilst complying with the recommended procedures. We have embedded MS into our documentation, 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.	Commenced implementation of the PCMS system. Further development work to capture all relevant data will be completed in 25/26.
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.	This has been undertaken and is an ongoing activity throughout the procurement pre and post award. Alerts are sent to the Procurement team to carry out these checks on a quarterly basis.
Work to embed Electronics Watch provisions and due diligence in contracts for IT and other electronic equipment	Most electronic components are purchased through the sector electronic components framework, which has Electronics Watch terms and conditions incorporated into the agreements with suppliers.

Looking forward to the 2025/26 financial year, the University will:

- Fully embed the recording of modern slavery actions during procurement and contract management into the new Procurement and Contract Management System (Accord) to improve our ability to monitor our contractors.
- Undertake and record due diligence on suppliers, carrying out quarterly checks and annual re-confirmation of compliance with the Modern Slavery Act from suppliers delivering high-risk contracts.
- 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 into sector frameworks.

## **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 2025 for the University and its subsidiaries.

A handwritten signature in black ink, appearing to read 'Aleks Subic', written in a cursive style.

**Aleks Subic**  
**Vice-Chancellor and Chief Executive**

**Date:** 5 December 2025