

MODERN SLAVERY ACT – TRANSPARENCY STATEMENT

MODERN SLAVERY ACT 2015

Modern Slavery and human trafficking statement

Introduction

This statement constitutes Harper Adams University's slavery and human trafficking statement for the financial year ending 31 July 2026. The University is legally required to publish an annual statement by section 54 of the Modern Slavery Act 2015. Modern Slavery is an overarching term to describe all forms of contemporary slavery including human trafficking, slavery, servitude, forced, bonded and child labour all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. This statement provides an update on the steps taken during 2024/25 financial year to prevent Modern Slavery and human trafficking in our operations and supply chains and reaffirms the University's commitment to continuous improvement in this area. It covers both our own workforce and measures in place to help address modern slavery in our supply chains.

Organisational Structure

Harper Adams University is a public university and as a charity operates on a 'not for profit' basis. The University delivers higher education in support of agricultural, agricultural engineering, food science and technology, environmental sciences, veterinary science and land-based sectors. Its primary activities are the provision of world class teaching and research.

Our Recruitment Practices

We have robust recruitment procedures in place to prevent slavery in our institution's workforce, and we are committed to continuing to use our procurement activities to combat modern slavery in our supply chains. We directly employ circa 600 employees, and we have a thorough set of employment related policies and procedures that prevent any possibility of Modern Slavery occurring within our workforce. Our Human Resources (HR) department and recruiting managers follow a recruitment policy and processes which are regularly reviewed for compliance with legislation.

At the time of application, potential employees must provide 'right to work' information which is checked prior to commencement. Most interviews are conducted face-to-face which ensures that individuals have freely chosen to attend. Where interviews are conducted via electronic means (such as MS Teams, for example), the candidate is required to present their original 'right to work' documentation (where applicable) in-person prior to commencing work, or through a remote checking service provider. All employees receive a written contract of employment. HR also provide information to all new employees on their statutory rights including sick pay, holiday pay and other benefits to which they may be entitled.

These actions mean that we can be confident in stating that there is no modern slavery in our directly employed workforce.

Our Supply Chains

We have zero tolerance to slavery and human trafficking. The University spends circa £14m annually with over 1,000 different suppliers purchasing a diverse range of goods, services and works. We recognise that with worldwide supply chains there are parts of the supply chain that could be engaged in modern slavery. The University has very limited resources to monitor and manage our supply chains therefore we focus on our direct suppliers, those from whom we directly purchase, known as our 1st tier suppliers. These 1st tier suppliers, in turn, trade with their own supply chains (2nd tier, 3rd tier and

so on) to produce and offer the goods, services and works that the University requires. Our 1st tier suppliers range from locally based micro businesses through to large global companies. Our supply chains mainly fall into the following categories:

- ICT Equipment and Services
- Estates and Facilities Goods and Services
- Laboratory Consumables and Equipment
- Library Resources
- Professional Services
- Agricultural Goods and Services

To identify risks and provide mitigation, the University requests all new suppliers to agree to our standard terms and conditions for goods and services reflecting our commitment to addressing Modern Slavery and to require its suppliers to comply with Modern Slavery legislation and address the risks of the same.

All University Tenders require tenderers to confirm the Organisation's policy to comply with their statutory obligations under the Modern Slavery Act 2015.

Our ICT and Estates departments are responsible for many of our high value contracts with suppliers. ICT requirements include IT systems, hardware and telecoms; Estates have requirements including capital works, facilities management, building maintenance and energy. Our other high value expenditure categories include agricultural equipment and consumables, laboratory equipment and consumables, library materials, food supplies and professional services.

Most of our purchases are from suppliers based in the UK. The Walk Free Foundation (which campaigns on Modern Slavery) have profiled modern slavery risks in the UK, and UK based industrial supply chains are not a common source of Modern Slavery. Whilst we cannot categorically state that there is no Modern Slavery in our 1st tier suppliers, we assess the risk of this as being low.

Only a small proportion of the University's purchases are from overseas suppliers. Typically, the overseas suppliers we use operate in high-tech industries in developed countries where the risk of modern slavery is less prevalent.

Recent Developments in Procurement

In 2025, the University appointed a new Head of Procurement who has conducted a review of institutional procurement practices and introduced several improvements designed to strengthen compliance and supplier assurance. These include:

- Increasing the lower procurement threshold from £2k to £4k under the updated Financial Regulations (approved February 2025).
- Introducing spot checks and enhanced record keeping, including a Procurement Exception Log.
- Receiving external training on the Procurement Act 2023 and ethical sourcing for key budget holders, Estates, and Finance teams.
- Adding procurement and modern slavery awareness to the induction programme for new budget-holders.

Actions taken in this Financial Year

We continue to remain aware of the developments taking place in the higher education procurement consortia. These are buying groups who aggregate the purchasing power of universities to improve value for money and increase our ability to influence suppliers. The consortia are an important part of our approach to Modern Slavery as we use their contracts for many commonly purchased items where modern slavery may be present in the supply chain (e.g. office stationery; IT hardware; laboratory consumables etc.). Effectively the University will be delegating its Modern Slavery supplier due diligence to the consortia for these products. We have seen evidence that the consortia have processes and procedures to tackle Modern Slavery and are confident that appropriate actions are being taken by them.

The Northwestern Universities Procurement Consortium secured membership of Electronics Watch on behalf of its full and associate members. Electronics Watch brings together public sector buyers and civil society organisations in electronics production regions with experts in human rights and global supply chains. They guide public procurement demand for decent working conditions in electronics supply chains and provide unparalleled capacity for public buyers to follow up on contractual demands through worker-driven monitoring which helps workers to voice complaints and contribute to solutions.

The University requires all new suppliers to agree to our standard Terms and Conditions for Goods and Services, which include explicit clauses on compliance with the Modern Slavery Act 2015. We also require tenderers to confirm that they meet their statutory obligations under the Act. For suppliers exceeding £100k, we review Modern Slavery Statements as part of ongoing supplier assurance.

During 2025/26, we will continue to deliver targeted training for staff involved in recruitment, procurement, and contract management, ensuring that awareness of modern slavery obligations remains embedded across all relevant functions.

Future Commitments

In the year ahead, Harper Adams University will:

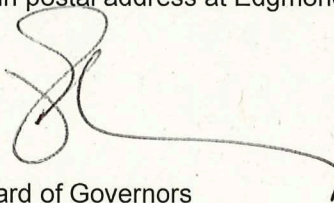
- Complete the review of procurement processes to align with the Procurement Act 2023.
- Strengthen supplier due diligence for higher-risk categories.
- Report annually to the Audit & Risk Management Committee on procurement compliance trends and modern slavery risks.

This statement has been approved by the University's Board of Governors and is signed on its behalf by the Chair of the Board of Governors who holds overall responsibility for compliance with the Modern Slavery Act 2015 (with delegated authority to the Chief Financial Officer). The statement will be reviewed annually and published on the University website and the Government's Modern Slavery Statement Registry.

Any questions or concerns about this statement of the University's supply chain due diligence can be directed to HAUprocurement@harper-adams.ac.uk or to the Chief Financial Officer via the University's main postal address at Edgmond, Shropshire, TF10 8NB.

Signed:

Dominic Wong
Chair of the Board of Governors



Date: 26/11/25

