

Modern Slavery Statement

Introduction from the Vice-Chancellor and Chief Executive

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.

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Professor Aleks Subic, Vice-Chancellor and Chief Executive

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 2,000 staff in the UK and had an annual turnover of £221 million for the financial year 2022/2023. The University had the following subsidiary companies in the year:

- Conference Aston Limited (Active)
- Beautiful Canoe Limited (Dormant)
- Aston Franchise Limited (Dormant until November 2022, subsequently dissolved)
- Aston University Consulting Limited (Dormant)
- Optimus Energy Limited (Dormant)
- EBRI UK Limited (Dormant)
- Aston Commercial Limited (Dormant)
- Birmingham Innovation Quarter Limited (Dormant)
- Aston University Ventures Limited (Dormant)

The University comprises three colleges:

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

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

In 2022/2023, the University spent approximately £65m 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 be an exemplar of behaviour and conduct in all that it does, and it aspires to demonstrate a fully compliant approach to ethical practice. Aston's new [2030 Strategy](#) sets out Integrity as one of the University's core values: by valuing honesty, trust, fairness and ethical behaviour, we always act with integrity and hold ourselves and others accountable.

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 our zero-tolerance policy to slavery and human trafficking and directs all our contractors and all those in our supply chain comply with our values through our contractual arrangements with them.

Due Diligence Processes

To fortify our approach, we are implementing new Modern Slavery in Procurement guidelines in financial year 2023/2024 to put in place clearer and more robust due diligence processes to identify and assess potential risk areas in our supply chains, mitigate the risk of slavery and human trafficking occurring in our supply chains and monitor potential risk areas in our supply chains and protect whistle-blowers. These guidelines obligate the Contract Manager to seek annual re-confirmation of compliance with the Modern Slavery Act from suppliers operating high-risk contracts, this is reflected in the KPIs proposed later in this document.

Risk assessment and management

Based on national guidance referred to in the new guidelines, we have looked at what we purchase in each of the high-level category groupings above (see Our Structure and Supply Chains). The following specific areas of our purchasing have been identified as typically having a high or medium level of risk of potential susceptibility to modern slavery and human trafficking occurrence. Other areas not listed are considered to be low risk. 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

As part of the new guidelines referred to above, all procurements in financial year 2023/2024 above £50,000 will require the Procurement Project Team to consider the risk for the contract in question and record this as high, medium or low and take appropriate mitigating action: this will effectively be an operational level risk assessment.

All extant contracts will be risk assessed in the same way in financial year 2023/2024. Modern slavery risks should also be assessed for contracts below £50,000 and appropriate mitigating action taken if considered necessary. Guidance is now provided in the Modern Slavery in Procurement guidelines for purchasers to conduct this assessment: purchasers are also 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 purchasing consortia. The University uses consortia procurement arrangements to procure a wide range of products, many of which are sourced from international manufacturers operating in low-cost countries where modern forms of slavery are prevalent. 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 Southern Universities Purchasing Consortium the University is an affiliate member. Contract-monitoring clauses created by Electronics Watch will appear in relevant agreements awarded by the consortia and used by the University from financial year 2023/2024.

Key performance indicators to measure effectiveness of steps being taken

Following internal audit activity in financial year 2022/2023 we recognised that the inclusion of KPIs would enable us to better monitor effectiveness in this area. We have designed the following KPIs which will be monitored throughout financial year 2023/2024, with the final position for the financial year reported to the Audit and Risk Committee in November 2024:

Indicator	Target
% of eligible (as defined below) staff completed mandatory anti-modern slavery training	95%
% of contracts over £50,000 with modern slavery risk assessment	100%
% of procurement processes over £50,000 with MSA checks	95%
% of high-risk contracts where annual reconfirmation has been received.	100%

Training on Modern Slavery and Trafficking

In financial year 2022/2023 we identified an initial list of eligible members of staff involved in procurement and mandated them to complete the HEPA¹ eLearning module 'Introduction to Modern Slavery'.

With the introduction of our new Learning Management System, more tailored Modern Slavery training will be made available internally in financial year 2023/2024 and the list of eligible staff will be expanded to a wider group of procurement stakeholders including contract managers of high and medium risk contracts.

Support will continue to be available from the Procurement team as indicated in our policies and processes. 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

Aston University commissioned an internal audit into Modern Slavery controls during financial year 2022/2023 which confirmed that the control environment was Satisfactory with exceptions. A number of the new procedures and guidelines outlined above are in response to recommendations made by the audit.

Over the next 12 months, we will work to develop and embed these procedures and guidelines and make sure proportionate and appropriate risk mitigation is in place to

¹ Higher Education Procurement Association (hepa.ac.uk)

support compliance with the anti-modern slavery policy to further ensure slavery and human trafficking is not taking place anywhere in our organisation or supply chain.

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 2023 for the University and its subsidiaries.

Signature:

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

Aleks Subic Vice- Chancellor and Chief Executive

Date: November 2023