Modern Slavery Statement 2021

Introduction

UAL is Europe’s largest specialist arts and design university, with over 20,000 students from more than 100 countries. It offers excellence in teaching, learning and research and puts students at the heart of its activities. Established in 1986 as the London Institute and achieving University title in 2004, UAL brings together six esteemed Colleges: Camberwell College of Arts; Central Saint Martins; Chelsea College of Arts, employing around 5,000 members of staff.

Purpose of this Statement

This Statement is published by UAL in compliance with the Modern Slavery Act for the financial year ended July 2021. For this purpose, the term ‘modern slavery’ describes various forms of exploitation which constitute serious violations of human rights, including human trafficking and forced labour. The statement sets out the steps UAL is taking to minimise modern slavery risk.

Staff recruitment

In the past year UAL has continued to mitigate the risk of modern slavery in directly employed staff through robust HR recruitment and candidate selection policies and checks.

Temporary staff are only recruited through established and accredited sources who provide assurance to UAL regarding the rights and welfare of their candidates and employees as well as the appropriate checks.

UAL has also a Whistleblowing Policy through which staff can raise any concerns on modern slavery.

Students

Although the risk of students being subject to modern slavery or human trafficking through direct contact with the University are extremely low, they may become aware of such instances.

To support students, UAL has in place easily accessible and well-publicised safeguarding channels through which students can obtain assistance, support and advice.

Procurement

During the year UAL has maintained its commitment to responsible procurement and to purchasing goods and services. In doing so we support the UK Government’s National Action Plan to implement the UN Guiding Principles on Business and Human Rights.
UAL procures goods, services and works from a wide range of suppliers across a number of categories, similar to other organisations in the education sector, some of which are considered to present a significant risk of modern slavery.

To mitigate this risk, UAL is an active member of the London Universities Purchasing Consortium (LUPC). UAL is thereby able to benefit from research and risk assessments of supply chain structures carried out by LUPC which, in high risk areas, includes due diligence procedures. In addition, through its membership of LUPC, UAL is affiliated to Electronics Watch, the mission of which is to protect the rights of workers in electronics supply chains.

Tenders for major supply contracts in 2020/2021 included a number of construction and maintenance programmes. We have continued to work with a framework of construction suppliers, all of which have been approved on the basis of their Modern Slavery practices. In all cases, suppliers were asked to confirm that they did not practice or condone any activities that could be regarded as violating the human rights of their employees. Within the subsequent contracts, we have inserted clauses relating to compliance with Anti-Slavery and Human Trafficking laws and stipulated London Living Wage for employees and any sub-contractors working at UAL.

We have tendered and awarded a new Facilities Management Contract incorporating key scoring criteria for Modern Slavery, Equality, Diversity and Inclusion. Contractual clauses are included to ensure that employees delivering within the UAL contract have working conditions in line with UAL strategy, including London Living Wage.

During the year we have also undertaken a major refurbishment project, contracting with the supplier ensuring that they perform their obligations under the terms of the contract to comply with all applicable anti-slavery and human trafficking laws. The contract also stipulates a minimum payment of London Living wage to the supplier’s employees, sub-contractors, agencies and third parties.

During 2020/21 we have been preparing our application for London Living Wage which has resulted in accreditation in September 2021. Preparation of our application included review of contracts contained within the UAL contracts database whereby the London Living Wage would apply.

The Procurement team have delivered a supplier day event to strategic suppliers which disseminated the importance of UAL strategies relating to:

- The triple bottom line, Planet, People and Profit
- Equality, Diversity and Inclusion,
- London Living Wage
- Social Value
- Climate Justice.

**UAL’s aims for 2021/22 are to:**

- Hold a supplier day for UAL framework construction contractors to promote the requirements of the Modern Slavery Act, Equality and Diversity. London Living Wage, Climate Justice and compliance to UAL policies.
- Tender for a framework of suppliers, incorporating compliance to modern slavery practices and UAL strategies for:
  - Asbestos management and asbestos contractors
Professional Services
- Partner with Citizens UK on our social purpose strategy
- Continue to work through the UAL supplier database to rollout the London Living Wage requirements
- Implement a due diligence process to review
  - Pre-selection: supplier analysis, tender submissions
  - Post-selection: introducing standards for monitoring due diligence through ongoing contract management.
  - Document standards for dissemination across the organisation and provide training.
- Ensure all our procurement professionals receive further advanced training on Modern Slavery, including in-house training where needs are identified.
- Continue to share best practice with the sector and keep up-to-date on identifying and assessing modern slavery risks within our supply chains.
- Raise awareness of the eLearning module available from BUFDG for use by UAL purchasers, to ensure they have an understanding of the Modern Slavery Act.
- Provide training resources on the Procurement intranet to all stakeholders

Approved and signed on behalf of the Court of Governors

Date: 2 December 2021