



Modern Slavery Statement 2022

Introduction

UAL is Europe's largest specialist arts and design university, with 22,000 students from over 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; London College of Communication; London College of Fashion and Wimbledon College of Arts employing around 6,000 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 2022. 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

Our Human Resources Policies set out workplace rights at the University. We are rigorous in checking that all new recruits have the right to work in the UK. We work closely with other partners such as recruitment agencies to mitigate risks. Where it is necessary to hire agency workers or contractors, we work with established and accredited agencies who provide written assurance to UAL of their fair work practices and follow our imposed selection criteria regarding their employment policies and practices especially around Equality, Diversity, and Inclusion. The University is accredited by the Living Wage Foundation, which certifies that all staff are paid the London living wage.

UAL adheres to the Public Interest Disclosure Act 1998 and implements its own Whistleblowing policy through which staff can raise concerns about modern slavery, potential corruption, fraud, and other unlawful or mal practices within the University.

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 when 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.

In September 2021 the University was successfully accredited as a London Living Wage employer.

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 2021/2022 included construction and maintenance programmes using framework of construction suppliers, all of which have been approved based on 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.

- In the year we have tendered and awarded significant contracts for:
 - Waste Management and Asbestos Management
 - Audio Visual equipment.

The tender process for these awards incorporated key scoring criteria for Modern Slavery, Equality, Diversity, and Inclusion.

The successful bidders have confirmed the following:-

- the amounts they pay their staff always complies with London Living Wage and regularly exceeds it
- they are committed to 16 hours per week minimum for their staff
- they are fully compliant with Modern Slavery Act 2015 and specifically section 54 (which requires organisations with a turnover of £36m or above to document steps that they have taken to ensure slavery and human trafficking are not taking place anywhere in their supply chain).

In addition, for those construction and maintenance contractors that have had performance reviews during the year, each supplier was asked for assurance that they adhere to the Modern Slavery Act 2015.

UAL's aims for 2022/23 are to:

- Hold a supplier day for UAL Strategic suppliers 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:
 - Design services
 - Recruitment through external agencies services
- Continue to work through the UAL supplier database to rollout the London Living Wage requirements
- Continue to a perform 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,
- Continue to share best practice with the sector and keep up-to-date on identifying and assessing modern slavery risks within our supply chains
- Work with the Chief Social Purpose Officer to raise awareness of UAL's accreditations and ethical commitments
- Raise awareness of the eLearning module available, to ensure all staff involved in purchasing and procurement understand the university's obligations under the Modern Slavery Act.
- Provide relevant training resources for all stakeholders

Approved and signed on behalf of the Court of Governors



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Date: 8 December 2022