



University of
East London

Pioneering Futures Since 1898

University of East London - Modern Slavery Act Statement for the Financial Year ending 31 July 2022

Introduction

The University of East London (**UEL**) is committed to combatting all forms of slavery, servitude, forced or compulsory labour and human trafficking and to only dealing with suppliers and business partners who share this commitment.

We believe that the measures we are putting in place are appropriate for our organisation in combatting modern slavery. However, we recognise that it is an ongoing issue for all organisations worldwide and we are committed to continually evolving and improving our approach to protect vulnerable individuals.

Definition

Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. It is a crime under the Modern Slavery Act 2015 and includes holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.

UEL's business

The University is an exempt charity under the terms of the Charities Act 2011, with the Office for Students (OfS) acting as the Principal Regulator. Our charitable objectives focus on the delivery of education and research. As a charity, the University must operate for public benefit.

We are a UK based university providing educational services to UK and international students and carrying out research activities. We partner with UK and internationally based academic institutions and educational providers partners who deliver UEL courses and their own UEL, and with international student recruitment agents around the world.

We have six academic Schools supported by the Office for Institutional Equity and professional services departments, including Procurement, Finance, HR, Estates, and the Office for Compliance Governance and Legal Services.

We have approximately 1,500 employees and over 25,000 students. We have an annual turnover of approximately £175 million (based on 2020/21 data).

We have two wholly owned subsidiaries, UEL Professional Services Limited and Knowledge Dock (UEL) Limited and they are included within the scope of this statement.

Our students are represented by the University of East London Students' Union. Although the Students' Union is an independent organisation, we monitor its budget and spend so it is included within the scope of this statement.

UEL's supply chains

Like all universities, we purchase a wide range of goods and services from our suppliers which are used in our business, including stationary and office supplies, consumables and equipment, library resources, catering services, cleaning services, security services and IT supplies.

The University's supply chains are truly diverse, with over 3000 suppliers supporting our delivery of high quality teaching and research.

However, we recognise the important role we play as the end customer and we are putting measures in place to make sure our suppliers are aware of our expectations and to positively influence their approach to modern slavery issues. As part of our procurement processes, we will use our supplier checks to make better and more informed assessments of modern slavery risks and, under our standard terms of business, suppliers will be required to give us assurances that their businesses and supply chains comply with all applicable laws, including the Modern Slavery Act. By doing this, the University is better positioned to identify suppliers who trade in commodities where potential for Modern Slavery and Human Trafficking is a higher risk. The highest risk commodities areas have been identified as follows:

- estates and buildings
- catering services and supplies
- audio-visual, IT and multimedia supplies
- furniture, furnishings and textiles
- domestic supplies and services
- professional and bought-in services including consultancy
- travel and transport (including vehicle hire and subsistence)

Business partners and agents

Like many universities, we work with a number of business partners in the UK and overseas who deliver their own UEL approved courses or deliver UEL courses under franchise models.

We also work with a number of agents in the UK and overseas who help us recruit new students.

As with our suppliers, we recognise the positive influence we can have on the behaviour of our business partners and agents. Therefore, as with our suppliers, we will use our supplier checks to make better and more informed assessments of modern slavery risks and we reserve the right to end our relationship with them if there is a modern slavery risk.

Moreover, we retain meaningful engagement with our partners throughout the life of each

contract and include anti-trafficking and slavery clauses in commercial agreements which enable us to terminate contracts when necessary. We also aim to incorporate Key Performance Indicators including anti-trafficking and anti-slavery actions for higher risk suppliers.

What are we doing now

The University has a tendering policy that details the processes for spending University funds with the supply chain.

We purchase extensively through framework agreements administered by sector purchasing consortia, particularly the London Universities Purchasing Consortium (**LUPC**) which accounted for 20% of our controllable spend (which excludes staff spend). LUPC has taken a leading role in identifying risks of human rights abuse within supply chains, and building appropriate clauses into supplier agreements.

We will continue to work closely with the LUPC and applaud their decision to employ a research associate to further develop supply chain mapping.

The University strives to build a better, more sustainable world. Aligned to our Vision 2028 goal to 'increase the reach and value of our activities to the communities we serve', we are growing research contributing to the United Nation's Sustainable Development Goals (SDGs).

The 17 SDGs are an urgent call for action by all countries working together in a global partnership. Our research priorities align with the UN's SGDs and are driving innovation in:

- creating sustainable cities and communities;
- reducing inequalities;
- transforming health and sustainable well-being.

Here are some ways the University of East London has responded to the UN's call for action:

[Sustainable Development Goals | University of East London \(uel.ac.uk\)](https://www.uel.ac.uk/sustainable-development-goals)

The University's terms and conditions for direct tendering or contracting, including the supplier on-boarding process, aim to ensure the potential for Modern Slavery and Human Trafficking are duly considered at the early stages of the contracting cycle.

We will continue to identify those supply chains that represent a risk of modern slavery, human trafficking, forced and bonded labour, and labour rights violations, by working with both suppliers and members of both regional and sector purchasing consortia, taking appropriate action if we become aware of such activity.

It is University policy that all new staff joining the University provide documentation to demonstrate their Right to Work within the UK before commencing employment. For those in higher risk areas, this is asked for at the interview stage.

Over recent years that have seen wide scale demand for Personal Protective Equipment (PPE) in response to the COVID 19 global pandemic, we have continued close working with suppliers of these products remaining conscious of the potential for labour rights violations, an approach, which has seen sharing of knowledge and scrutiny of supplier audits with their supply chain.

Future steps

We are committed to better understanding our supply chains and working towards greater transparency, due diligence and compliance in future years, for example by expanding our supplier questionnaires to include relevant supplier and supply chain questions and introducing anti-slavery obligations into more of our supply and partner agreements, as these are updated. The University is committed to a continuous review of the supply chains it uses, working towards greater transparency and awareness of the people working within them.

We understand modern slavery is an ongoing worldwide issue and we are committed to continuous improvement to ensure our business runs in an ethical and sustainable manner.

The challenge of modern slavery and human trafficking is one that is best addressed through the ongoing and proactive engagement with suppliers. In addition to where the University has responsibility for its own supply chains it will review its engagement beyond our suppliers and look to ensure that those who trade on the University's premises put in place are appropriate measures for combatting modern slavery.

The University's aim is to have an inclusive approach to the supply chains and defines its role in advising and coaching regarding inclusivity by engaging with the Higher Education Procurement Consortia and wider professional networks such as the Higher Education Procurement Association.

During the Financial year ending 31 July 2023 we will:

- Continue dialogue with suppliers to the University, to explore collaborative supply chain mapping, whereby both the costs and outputs/benefits can be shared.
- Develop/update the Procurement Strategy. This is an opportunity to reflect upon progress in all areas, including the commitment to addressing the modern slavery agenda.
- Work with our sustainability team, to explore the suitability and associated benefits of integrating responsibilities under the Modern Slavery Act 2015.
- The University already makes the Public Interest Disclosure Policy available to staff, students and suppliers. It is available to support the anonymous reporting of any abuse, harm or hate and any such allegations are taken incredibly seriously. We will review the suitability of using this platform as a mechanism to report any modern slavery or human trafficking concerns
- Engage with the [UK modern slavery & exploitation helpline \(Unseen\)](#).

MSA Working Group

We maintain a modern slavery working group with representatives from our legal, governance, procurement and HR teams to identify the risk areas within our business and supply chains and to decide the best ways for us to deal with those risks. The working group is responsible for ongoing compliance with the MSA and for producing our annual MSA statements which will be approved by the Board of Governors.

UEL's staff and students

As stated above, we have a whistleblowing policy in place so our staff and students know they can report actual or suspected incidents of modern slavery without suffering unfavourable or detrimental treatment.

We will also provide information and/or training to appropriate staff within our business so they have an appropriate level of understanding of the risks of modern slavery and know how to report any concerns or issues.

London Living Wage

We are a London Living Wage employer so we pay all our direct staff at or above the London Living Wage rate as set by the Living Wage Commission. We also require a number of our key suppliers to commit to paying their staff working on our sites at or above the London Living Wage.

We believe that this commitment to the London Living Wage significantly reduces the risk of individuals working at our sites being paid below the national minimum wage, a key modern slavery risk.

Record keeping

Our University Secretary will maintain a central record of any modern slavery issues which have been reported to monitor compliance and support continuous improvement.

Further Information

Further information about the Modern Slavery Act can be found at <http://gla.gov.uk/who-weare/modern-slavery/>

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's modern slavery statement for the financial year ending 31st July 2023.

University of East London
Date: 30 September 2022