

University of East London - Modern Slavery Act Statement for the Financial Year ending 31 July 2024

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 this is an ongoing issue for all organisations worldwide, and we are committed to continuously improving our approach to protecting vulnerable populations.

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. This is for the purpose of exploitation. The Modern Slavery Act 2015 defines slavery as holding a person in slavery, servitude, forced or compulsory labour, or facilitating their travel with the intention of exploiting them shortly thereafter.

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 the 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 who are able to deliver UEL courses and their own. In addition, we partner with international student recruitment agents around the world.

Six academic schools are supported by the Office for Institutional Equity and its professional services departments, including Procurement, Finance, Human Resources, Estates, and Compliance Governance and Legal Services.

We have approximately 1,700 employees and over 25,000 students. We have an annual turnover of over £260+ million (based on 2022/23 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. These include stationery 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 significant role we play as the end customer. Therefore, 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. To assess modern slavery risks, we will use supplier checks as part of our procurement processes. This is because suppliers will be required to give us assurances that their businesses and supply chains comply with all applicable laws, including the Modern Slavery Act. In this manner, the University is better able to identify suppliers who trade in commodities where there is a higher risk of Modern Slavery or Human Trafficking.

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 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 several 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.

The Policy on Human Trafficking

UEL is aware of the responsibilities it bears towards service users, employees and student communities. UEL are guided by a strict set of ethical values in all the business dealings and expect the suppliers to adhere to these same principles.

UEL have zero tolerance for slavery and human trafficking. Staff are expected to report concerns about slavery and human trafficking and management are expected to act upon them in accordance with the policies and procedures.

Due Diligence

To identify and mitigate the risks of modern slavery and human trafficking in the own business and the supply chain UEL:

- Undertake appropriate pre-employment checks on directly employed staff and agencies on approved frameworks which are audited to provide assurance that pre-employment clearance has been obtained for agency staff.
- Implement a range of controls to protect staff from poor treatment and/or exploitation, which comply with all respective laws and regulations. These include provision of fair pay rates, London Living Wages, fair Terms and Conditions of employment and access to training and development opportunities.
- Purchase most of the products from UK or EU based firms, who may also be required to comply with the requirements of the UK Modern Slavery Act (2015) or similar legislation in other EU states.
- UEL purchase extensively through framework agreements administered by sector purchasing consortia, such as the London Universities Purchasing Consortium (**LUPC**) which accounted for 20% of the 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. UEL will continue to work closely with the LUPC and applaud their decision to employ a research associate to further develop supply chain mapping.
- Supplier Code of Conduct' includes a provision around forced labour with effect from January 2017, require all suppliers to comply with the provisions of the UK Modern Slavery Act (2015), through the purchase orders and tender specifications, all of which set out the commitment to ensuring no modern slavery or human trafficking related to the business.
- Where possible build long-standing relationships with suppliers

What are we doing now

University funds are spent with the supply chain in accordance with a tendering policy.

Our purchases are primarily made through framework agreements administered by sector purchasing consortiums, particularly the London Universities Purchasing Consortium (LUPC), which accounted for 20% of our controllable expenditures (excluding staff costs). LUPC has taken a leadership role in identifying risks of human rights abuses within supply chains and ensuring that appropriate provisions are included in supplier contracts.

Our team will continue to work closely with LUPC and applaud their decision to hire a research associate to advance supply chain mapping.

As part of its mission, the University strives to build a better, more sustainable world. As part of our Vision 2028 goal, we are expanding research that contributes to the Sustainable Development Goals (SDGs) of the United Nations.

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 Sustainable Development Goals and drive 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. We will do this 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 increased transparency and awareness of the people involved 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 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. It will look to ensure that those who trade on the University's premises take the appropriate measures for combating modern slavery.

The University's aim is to have an inclusive approach to supply chains. It 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 2025 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.
- Work towards Vision 2028
- 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 \(Unseen\)](#) (* we have contacted them for corporate collaboration)

MSA Working Group

We maintain a modern slavery working group with representatives from our legal, governance, procurement and HR teams. This group is designed to identify the risk areas within our business and supply chains and to decide the most effective ways for us to deal with those risks. It is the responsibility of the MSA working group to ensure continued compliance with the MSA as well as to produce our annual MSA statements that will be approved by the Board of Governors.

UEL's staff and students

As stated above, we have a whistle blower policy in place. This is 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. This will ensure 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 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 2024.