

Slavery and Human Trafficking Statement

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are opposed to such abuses in our direct operations, our indirect operations and our supply chain as a whole. As an educational establishment dedicated to the creative arts, we are committed to embedding sustainable development into our academic provision. This includes encouraging students to consider concepts of global citizenship, issues of social justice, ethics and wellbeing and to understand the consequences of actions which could impact on a community's sustainable future (UCA's Strategy for Education for Sustainable Development). We are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the University's slavery and human trafficking statement for the financial year ending 31 July 2016. It sets out the steps the University has taken to ensure that slavery and human trafficking do not take place in any part of our business or our supply chains.

Organisational Structure

The University is an HE corporation and an exempt charity under the terms of the Charities Act 2011. Our core business is the advancement of Further and Higher Education and research in our specialist disciplines. The majority of our income comes from tuition fees and we also receive some public funding directly from the Higher Education Funding Council for England (HEFCE). We generate further income by providing accommodation and catering services to our students and staff.

We are based on four campuses in the southeast of England with 5,800 enrolled students (2015/16) and 788 members of staff (2015/16).

The University's total income for financial year 2015/16 was £58, 171k.

Our Supply Chains

The Supply Chain to UCA is varied and includes the supply of goods and services to support the effective running of a university. Key spend areas include: Estates/Facilities Management; Information Technology Equipment and Services; Student Materials and Support; and Public Relations and Marketing.

Relevant Policies

In keeping with our commitment to act with integrity in all our business dealings, many of our existing policies govern how the University conducts its business operations, to include sustainable, ethical, economic and social considerations in its purchase of goods and services and in the employment of staff.

Relevant Policies include:

- Procurement Policy;
- Anti-Fraud and Anti-Bribery Policy;
- Recruitment and Selection Framework;
- Disciplinary Policy & Procedure;
- Whistleblowing Policy.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have put in place a new policy on Ethical Sourcing

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we will raise the profile of Modern Slavery within UCA and with our supply chain. We will continue to work with our HE colleagues and university consortia to identify best practice and work with them to understand and better manage key risk areas.

As part of this, we have in place systems to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains;
- Protect whistle blowers and report unethical conduct;
- Build relationships with recognised purchasing consortia and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and our contractors to comply with our values.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we intend to provide relevant training to members of staff.

Our effectiveness in combating slavery and human trafficking

We monitor the following areas to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- The effectiveness of our Recruitment and Selection Policy;
- Number of new employees who have completed Code of Conduct compliance training;
- Staff Survey outcomes including employee engagement;
- Disciplinary Policy and Procedure;
- Whistleblowing Policy;
- Regular Equal Pay Audit Outcomes;
- Commitment to payment of the Living Wage to all employees;
- Grievances raised due to concerns of slavery or human trafficking in any part of the business or supply chain.

We intend to develop further measures to monitor supply chain compliance in the future and to include compliance in our internal audit programme.

In relation to supplier standards, we have:

- Identified categories of Suppliers who are at high risk of Modern Slavery (by commodity sector or location);
- Enhanced the knowledge of the procurement team, the Leadership Team and the Board of Governors on the requirements of the Modern Slavery Act and worked actively with other HE institutions on best practice approaches;
- Formed a compliance team to manage UCAs response to the Modern Slavery Act;
- Conducted risk assessment and reviewed our relevant internal policies.

Our plans for the future

As part of this reporting exercise in this and the coming years, we are committed to better understanding our supply chains and working towards greater transparency. Following a review of the effectiveness of the steps we have taken during this reporting period to ensure that there is no slavery or human trafficking in our supply chains we have updated our action plan to prioritise the following areas in the coming year:

- Identify all UCA suppliers in high risk areas to understand their provisions on Modern Slavery and Human Trafficking;
- Work with the University Consortia to ensure that 100% of consortium suppliers have effective Modern Slavery Arrangements;
- Ensure all new suppliers to UCA understand our approach to Modern Slavery and will be required to have the relevant statements/practices in place;
- Ensure our relevant processes are subject to internal audit within the next 3 years.

This Statement has been approved and published by the University's Board of Governors and will be reviewed at least once annually.

Rob Taylor
Chair of the Board of Governors
University for the Creative Arts

Date: 11 October 2016