

# Modern Slavery Statement

## Policy Statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and applies to UK business entities which form part of Global University Systems (GUS) in the UK (referred to in this statement as 'the Company'). The information included in the statement refers to the financial year 2020/2021.

## Company structure

The Company operates in the education sector in the UK as the UK arm of Global University Systems. GUS is an international network of higher education institutions, brought together by a shared passion for accessible, industry relevant qualifications. GUS partners with internationally minded, innovative and forward-thinking educational institutions. GUS is based in some of the world's biggest cities, with campuses in London, Birmingham and Manchester, Ireland, across the Atlantic in Toronto, Chicago and Vancouver and across the globe in Singapore, India, Philippines, Germany and Israel. The Company's headquarters are in the London.

The Company delivers a wide variety of programmes, including bachelor's degree programmes, master's degree programmes, professional training, English Language training and corporate and executive education. In addition, the Company provides collaboratively with GUS overseas entities, services for the Company's entities in the UK and overseas including Human Resources, Sales and Marketing, Information Technology and Communications.

The Company's headquarters are in the London, with staff also working in Birmingham and Manchester. Company staff will travel to GUS educational institutions and service hubs in Ireland, Germany, India, Singapore, Israel, the Philippines and Canada.

## Definitions

The Company considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

## Commitment

The Company acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Company understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Company does not enter into business with any other company, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Company strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK and in many cases exceeds those minimums in relation to its employees.

## **Supply chains**

The Company is committed to ensuring that our supply chains remain free of slavery. In order to fulfil its activities, the main supply chains of the Company include those related to offices, consultants and agency workers, recruitment agencies, security staff including CCTV operations, delivery and professional services. We understand that the Company's first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

We have implemented the following measures to ensure our supply chains remain free of slavery including:

1. Our standard contracts include an anti-slavery clause, which requires our suppliers to ensure that they are complying with the Act and any associated legislation.
2. We have a standard clause in the contract which includes a right to audit suppliers annually on their compliance with the Act.
3. Best practice is used in engagement of suppliers.
4. We use reputable agencies with whom we have contracts in relation to each appointment when recruiting staff.
5. All staff recruited through a recruitment agency are required to provide right to work documents prior as part of our pre-employment checks.
6. We comply with regulations in relation to agency staff reaching 12 weeks of engagement
7. Every new and existing supplier will be asked to provide a copy of their Modern Slavery Policy or Statement as proof or add a clause into contract that they are compliant with the Modern Slavery Act. Failure to provide such proof/contract clause will flag the supplier as potentially non-compliant and an alternative supplier/contractor will be found.
8. We will ensure that each person responsible for any particular aspect of procurement within the company is familiar with the Modern Slavery Act prior to committing to the purchase and will request proof from the new supplier.
9. We will ensure that everyone involved is familiar with the Act and follows the above rules.
10. We are committed to ensuring our policies and procedures are kept up to date will all legislative changes including full compliance with the Modern Slavery Act.

11. Similarly, a condition of procurement and contracting process is that all suppliers and contractors are able to demonstrate adherence to employment legislation and where applicable that they are compliant with the annual reporting requirements contained within section 54 of the Modern Slavery Act.

### **Potential exposure**

The Company considers its main exposure to the risk of slavery and human trafficking to exist in the procurement of goods manufactured overseas because they involve the provision of labour in a country where protection against breaches of human rights may be limited.

In general, the Company considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any company that supplies goods and/or services to it.

### **Impact of COVID-19**

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for the Company, as it did for others across the nation.

The Company welcomes the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.

Unfortunately, the Company assessed that it would need to delay the publication of this statement for the 2019/2020 financial year due to the impact of COVID-19. It has therefore been delayed for 18 months. The reason for the delay was the moving of the year end to 31<sup>st</sup> May 2021 due to the pandemic.

The Company concludes that the COVID-19 pandemic did not adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under 'Potential Exposure' section above.

The company's use of suppliers dropped significantly due to the fact that homeworking was swiftly implemented in March 2020 which meant that its premises, from which it usually conducts day to day business, were temporarily closed.

During the pandemic, the Company's employees still had access to the grievance procedure to raise any concerns that they may have had.

In line with emergency legislation passed by the Government, employees have been paid Statutory Sick Pay or company sickness payment during periods of self-isolation where it has not been possible to agree a temporary period of homeworking.

The Company's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

## **Steps**

The Company carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its company or supply chains, including conducting a review of the controls of its suppliers.

The Company has not, to its knowledge, conducted any business with another company which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Company has taken the following steps to ensure that modern slavery is not taking place:

- reviewing the Company's supplier contracts to include termination powers if the supplier is, or is suspected, to be involved in modern slavery.
- measures in place to identify and assess the potential risks in its supply chains
- creating action plans to address risk to modern slavery.
- any actions taken to embed a zero-tolerance policy towards modern slavery.
- ensuring that all staff involved with procurement have undertaken the relevant internal training.

## **Key performance indicators**

The Company has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Company or its supply chains.

All existing and future suppliers and contractor will be requested to provide documentation that they are compliant with the Act.

Training records will be kept for all staff undertaking the on-line training.

## **Policies**

The Company has the following policies which further define its stance on modern slavery:

- Recruitment & Selection Policy
- Anti-Corruption and Bribery Policy
- Anti-Harassment and Bullying Policy
- Whistleblowing Policy
- Disciplinary and Grievance Policies
- Salaries and Payments Policy
- Modern Slavery Training

**Slavery Compliance Officer**

The Company has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Company's obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.