The University of Law

Slavery and Human Trafficking Statement 2020

Introduction

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Structure

The University of Law is a limited company incorporated in the United Kingdom under company registration number 07933838. Global University Systems B.V., which is registered in The Netherlands under company number 55367453, is the ultimate parent company. This Statement applies to all University employees and other companies within the University of Law group including The College of Law Services Limited, and ULaw (UK) Limited.

The University of Law is governed by a Board and an Executive Team. The Board is made up of senior Executive Directors and independent Non-Executive Directors. Its role is to oversee all aspects of the University's operations, with special responsibility for ensuring its academic quality and regulatory requirements. The Executive Team is responsible for the strategic development and day-to-day management of the University.

Our vision is to be the professional university of choice for students of law and business, delivering an outstanding academic and employment-focused student experience.

The University of Law is the UK's longest-established specialist provider of legal education. The University attracts a range of students and counts among its clients some of the world's largest law firms. As the legal profession has evolved the University has driven innovation in course design to deliver new programmes to both enhance opportunities for students and to align with the needs of the legal sector and wider economy, diversifying our offer to include business both as an integral part of our legal education and as a new provision at undergraduate and post graduate level.

The University has campuses in Berlin, Birmingham, Bristol, Chester, Guildford, Hong Kong, London (Bloomsbury and Moorgate), Manchester, Nottingham and Leeds with satellite campuses in Reading, Exeter, East Anglia and Liverpool, employing over 800 staff including c300 teaching staff made up of solicitors and barristers. There are around 10,500 undergraduate and postgraduate young professionals throughout the University.

Policies and training relating to slavery and human trafficking

Policies

The University of Law adopted a Slavery and Human Trafficking policy in 2016. This policy demonstrates our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

The policy reflects best practice and a copy of the updated Anti-Modern Slavery and Human Trafficking Policy can be found here <u>www.law.ac.uk/modern-slavery-policy</u>. The Policy is reinforced by other University policies such as the Voicing Concern policy which sets out the University's commitment to protecting whistle-blowers and the University's procurement policy which reflects the requirements of the Modern Slavery Act 2015 and an ethical approach to procurement.

<u>Training</u>

All staff have received (and all new staff will receive) e-learning training to ensure a high level of understanding of the modern slavery and human trafficking risks in the University's supply chains and our business. The e-learning assists staff in identifying modern slavery and taking appropriate action to bring any issues to the attention of the University, or the Modern Slavery Helpline.

The University's recruitment and employment practices

The University prides itself on being a best practice employer. We ensure that all Right to Work checks are undertaken and evidence retained as necessary. We also ensure that all our employees and workers are paid the Real Living Wage as a minimum. We are confident that we have appropriate mechanisms in place, in respect of supervision and line management, to identify any issues in relation to modern slavery in our workforce. We are not aware of any such issues.

We shall continue to monitor our practices to ensure that all employees are treated fairly and with dignity.

Supply chains, due diligence and mitigation of risk

Our supply chains include the purchase of goods and services necessary for the operation of the University. Our supply chains are diverse and include individuals as well as large commercial entities. We have introduced a Supplier Code of Conduct which sets out our expectations in relation to our suppliers, requiring both suppliers and suppliers' sub-contractors to treat their workers with dignity and respect, adhere to applicable laws and regulations, and make their products or provide services or works in an environmentally sustainable manner.

The University utilises contractors and casual workers in its business to undertake specific pieces of work. We do not consider that these arrangements pose a significant risk in respect of modern slavery as the University contracts direct with the contractor. We require these individuals to confirm they have read and understood our Anti-Modern Slavery and Human Trafficking Policy and then complete the same e-learning as University staff.

The University contracts with third party providers in relation to its facilities managements and catering functions and, to mitigate the risks of modern slavery in our supply chain, we require those entities to comply with ethical procurement standards and the provisions of the Modern Slavery Act 2015. We have undertaken due diligence on pay practices to audit pay levels and to ensure all supplier staff are paid on-line.

In general, we require suppliers to contract on the University's standard terms. These terms require suppliers to commit to ensuring compliance with the Modern Slavery Act 2015 and:

- Pay all staff aged 18 or over, a minimum of the Real Living Wage (London or UK as appropriate, depending on location) and pay any contract or sub-contract staff aged 18 or over, a minimum of the Real Living Wage (London or UK as appropriate, depending on location), and to comply with the guidelines governing the payment of the Real Living Wage, as determined by the Living Wage Foundation;
- Comply with any applicable minimum wage requirements of another country, for those staff members, contract or sub-contract staff, where such individuals are based in that other country;
- Ensure that all staff are subject to UK Right to Work checks or other checks necessary to ensure compliance with UK or, where applicable, other countries' immigration requirements;

- Comply with the University's due diligence process to assess risk generally when dealing with suppliers and partners.
- At all times follow any applicable law and good practice in relation to the ethical procurement of goods and services including but not limited to minimising the risks of supporting fraud, bribery, corruption and human rights abuses.

We are committed to ensuring that all contracts with suppliers, regardless of whether they contract on our terms or otherwise, shall contain appropriate provisions requiring all suppliers to adhere to the University's values in respect of modern slavery and the requirements set out above.

The University's Procurement team oversees compliance with contractual obligations to comply with anti-slavery and human trafficking obligations and undertakes supplier due diligence where appropriate.

Effectiveness of our existing procedures

Our procurement team continues to promote transparency in our supply chain. We continue to build on our current policies and procedures to identify and assess potential risks in our supply chains.

We have introduced a contractual right into our contract terms which allows the University to monitor the adherence of suppliers with its values in respect of modern slavery. This is being achieved incrementally by insertion of a contractual right to do so on renewal of existing contracts, and in new contracts.

Our procurement team is undertaking a programme of visits to our UK based suppliers and undertaking due diligence on key areas. The due diligence includes an audit of the supplier pay policies to ensure contractor staff are paid the National Living wage or the London Living Wage (where appropriate) and are paid on-line.

We have not identified any relevant issues to date. We are mindful that this is an on-going threat and are committed to continuing our audit and due diligence work with suppliers and to continue to seek to improve 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 our slavery and human trafficking statement for the financial year ending 30 November 2019.

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Date: 15th July 2020