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Slavery and Human Trafficking Statement for the financial year ending 31 July 2018

Introduction from the Chair

This statement is made pursuant to Section 54(1), Part 6 of the Modern Slavery Act 2015, and constitutes UCAS' slavery and human trafficking statement for the financial year ended 31 July 2018. It sets out the steps UCAS and UCAS Media Limited have taken to minimise the risk of slavery and human trafficking taking place in our supply chains, or in any part of our business.

Slavery and human trafficking remain a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

Organisation structure

UCAS is a charity that provides applications and admissions services, across a range of subject areas and modes of study, for UK higher education providers. UCAS is the parent company of a wholly owned subsidiary, UCAS Media Limited, which is a commercial enterprise that offers marketing solutions to clients wishing to reach students and their influencers. The group has its head office in Cheltenham, UK. The group has an annual turnover in excess of £44million.

Our business

Our business is organised into seven business units:

- **Operations** – delivers planning, oversight, and delivery of the end-to-end annual admissions delivery cycle across all UCAS schemes.
- **Analysis and Insights** – provides high quality research and analysis services to underpin the UCAS business and meet the needs of our customers.
- **External Relations** – provides intelligence and insight to enhance UCAS' reputation, and to drive and inform the strategic development of products and services. The unit comprises a number of functions including marketing, policy and qualifications, press and public relations, and internal communications.
- **Finance and Corporate Services** – encompasses financial planning and accounting, facilities and building management, procurement, corporate governance and performance, and legal and compliance.
- **Human Resources** – includes HR operations, recruitment, HR business partnering, and talent and learning.
- **Technology (IT)** – responsible for the IT backbone which supports the UCAS business model.

- **UCAS Media Limited** – offers marketing and brand insight services, and data products and tools to public and private customers. It generates revenue, which is then reinvested back into the charity, to further its charitable objects.

Our supply chains

Our supply chain network is largely service driven to benefit our applicants and higher education providers. The services provided by our suppliers include managed IT services, overflow outsourced call centre activity, venue hire, agency labour and contractors, as well as support supply chains incorporating IT equipment, facilities management, cleaning, catering, security, office furniture, and workwear.

Our policies on slavery and human trafficking

We are committed to ensuring that the risk of modern slavery and human trafficking occurring within our supply chains, or any part of our business, is kept to an absolute minimum. Our Procurement Policy reflects our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective and proportionate safeguards and controls.

Our people

UCAS employs approximately 465 people. Our staff are expected to work in line with our core values and principles. We have a variety of supporting documentation to guide employees on how to work in an honest and ethical manner, along with providing appropriate channels to give the confidence

to report any suspected unethical conduct in UCAS. We operate an independent whistle-blowing helpline.

UCAS is committed to providing an environment where employees can thrive, and operates under the Workplace Wellbeing Charter it was awarded in December 2016.

To ensure a high level of understanding of the risks of modern slavery and human trafficking among key personnel, the Commercial Working Group (below) has received specialist training in this area.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk, we have established the Commercial Working Group, responsible for developing systems to:

- identify and assess potential risk areas in our business affairs
- mitigate the risk of modern slavery and human trafficking
- monitor potential risk areas
- protect whistleblowers

Supplier adherence to our values

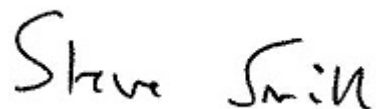
We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, our terms and conditions for the supply of goods and services require suppliers to:

- comply with all applicable anti-slavery and human trafficking laws, statutes, regulations, and codes from time to time in force, including the Modern Slavery Act 2015
- have and maintain throughout the term of this agreement their own Anti-Slavery Policy and procedures, to minimise the risk of non-compliance
- not engage in any activity, practice, or conduct, that would constitute an offence under sections 1, 2 or 4, of the Modern Slavery Act 2015, if such activity, practice, or conduct were carried out in the UK
- ensure that each of their subcontractors and suppliers shall comply with their Anti-slavery Policy, and with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force including, the Modern Slavery Act 2015

Our Procurement Team has raised awareness of these changes through email distributions, asking suppliers to comply with our terms and conditions. Where the business has outsourced services, there are dedicated staff, responsible for the effective management and control of the outsourcing relationships. To mitigate and remove risks in the supply chain, where possible, UCAS contracts with suppliers under appropriate consortium-led framework agreements.

This statement was approved by the Board of Directors of UCAS on 6 December 2018.

Signed for and on behalf of the Board of Directors of UCAS by

A handwritten signature in black ink that reads "Steve Smith". The signature is written in a cursive, slightly informal style.

Professor Sir Steve Smith

Chair

Date: 6 December 2018

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