



UCFB|GIS*

Modern Slavery Policy

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1. Introduction

- 1.2 UCFB|GIS is committed to combatting slavery and human trafficking and expects the staff, students, suppliers, contractors and all those that the institution conducts business with to adhere to their policy and practices in this respect.
- 1.3 Modern slavery is defined as the recruitment, movement, harbouring or receiving of person(s) by force, coercion, abuse of vulnerability, deception or other means, for the purpose of exploitation. It is a crime under the Modern Slavery Act 2015 and includes holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.

2. Purpose

- 2.1 This policy provides information on the institutions commitment to combatting modern slavery and measures taken.
- 2.2 UCFB|GIS will operate a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in the institution.
- 2.3 The policy and procedures outlined within are in accordance with the Modern Slavery Act 2015: <https://www.legislation.gov.uk/ukpga/2015/30/contents>.

3. Scope

- 3.1 This policy applies to all UCFB|GIS staff, students, suppliers, agency workers, volunteers, interns, contractors and external consultants and all those with whom the institution conduct business with.
- 3.2 This policy aligns with the University of East London (UEL) Modern Slavery Policy.
- 3.3 Under section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015, certain commercial organisations must publish an annual statement setting out the steps taken to prevent modern slavery in their business and their supply chains.
- 3.4 A commercial organisation is required to publish an annual statement if all the criteria below apply:
 - *it is a 'body corporate' or a partnership, wherever incorporated or formed*
 - *it carries on a business, or part of a business, in the UK*
 - *it supplies goods or services*
 - *it has an annual turnover of £36 million or more*

UCFB|GIS do not meet this criterion and are therefore not required to publish an annual statement.

- 3.5 This Policy does not form part of any employee's contract of employment, and it may be amended at any time.

4. Policy

- 4.2 The institution demonstrates its commitment to tackling modern slavery by its promotion and adoption of the following policy measures:
- 4.2.1 The prevention, detection, and reporting of modern slavery in any part of its business or supply chains is the responsibility of all those working for or with the institution.
 - 4.2.2 Having due diligence processes carried out in relation to modern slavery which may include considering human rights in a sector or country, the type of sector in which a service provider operates, the countries from which services are provided, the nature of relationships with suppliers, and the complexity of supply chains.
 - 4.2.3 Having supply chains continually risk assessed and managed in relation to modern slavery with and any high-risk suppliers being subject to due diligence including independent auditing.
 - 4.2.4 Requiring those involved with finance, procurement and purchasing to undertake the institutions online Modern Slavery Awareness Certification.
 - 4.2.5 Highlighting modern slavery issues within its communications to academic faculty, professional service departments and suppliers to maintain and increase awareness of the issue.
 - 4.2.6 To encourage anyone to raise any concerns about modern slavery at the earliest possible stage, if necessary, through the Whistleblowing Policy [in the first instance concerns may be raised with the Chief Operating Officer]. This includes conflicts which may have already occurred or may occur in future. UCFB|GIS encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
 - 4.2.7 To continue to develop its commitment to combat modern slavery and human trafficking and will outline such activities within the annual review of this policy. UCFB|GIS would also outline this in any subsequent annual anti-slavery and anti-trafficking statement, should the institution meet the criterion in future.

5. Related Policies and Procedures

- 5.1 Any breaches of this policy may result in UCFB|GIS taking disciplinary action against individual(s), which could result in dismissal for misconduct or gross misconduct. It may also result in UCFB|GIS terminating its relationship with any other individuals, suppliers or organisations working on its behalf if they breach this policy.
- 5.2 UCFB|GIS endeavour to ensure that the institutions employment, recruitment, dignity at work, EDI and other relevant policies and procedures support its efforts to combat modern slavery and human trafficking.

6. UCFB|GIS Organisational Structure and Supply Chain

6.1 UCFB is an established specialist provider of Higher Education within the football and sports industries with two permanent UK campuses, in north London and Manchester. Additionally, UCFB|GIS have global sites for teaching delivery in Miami and Melbourne. UCFB|GIS is dedicated to the delivery of undergraduate degree programmes in the football and sports industry, whilst UCFB's Global Institute of Sport (GIS) is a leading destination for Master's degrees and executive education.

The UCFB|GIS mission is 'to be the world's leading sports education institution'. As at 2022, the institution had 2800 students mostly based at the Manchester and London campuses. UCFB|GIS workforce sat at approximately 280 incorporating both academic and professional services staff.

6.2 In respect of modern slavery, UCFB|GIS have two main risk areas;

1. People: A diverse population of staff and students. The student body consists of a large number of young adults. Most undergraduate students are UK/Home based students, but there is also a niche international student population. The welfare of staff, students and visitors is UCFB|GIS' highest priority.

2. Supply chains: UCFB|GIS have a large campus used for a wide range of teaching and support activities. To facilitate this, the institution has a supply chain from which a wide range of works, goods and services are purchased. Over the year UCFB|GIS transacted with a large number of suppliers., As an organisation, UCFB|GIS are committed to spend money in a responsible manner.

6.3 . As part of the procurement process, all prospective suppliers must meet the requirements of the Request for Proposal (RFP), as set out in Annexe A.

7. Equality Impact Assessment

7.1 An Equality Impact Assessment has been completed in respect of this policy.

Annexe A

Request for Proposal (RFP) Criteria:

Prospective suppliers must provide details of the following:

- Management and staffing levels and structure
- Equal opportunities recruitment policy
- Environmental & Sustainability policy
- Health & Safety Policy (in advance of specific detailed risk assessments and method statements) and all H&S certification for the business and staff
- Trade qualifications and management system details, e.g. relevant BS for Quality Management Systems and Environmental Management Systems
- Staff training, induction and competence assessment
- Required qualifications of staff e.g. IOSH
- Equipment suitability - adherence / accreditation to relevant ISO standards
- Contract Methodology and mobilisation plan:
 - Site visit and assessment
 - TUPE Policy
 - Staffing plan
 - Equipment procurement
 - Load-in and familiarisation
 - Pre-contract works
 - Health and Safety Documentation submission (including COSH Booklet)
 - Contract commencement
- Record maintenance and audit procedures for quality control and improvement
- Suitable levels of Employers' Liability and Public Liability Insurance (min £10m for each single occurrence)
- Affiliation to or membership of relevant industry institution (e.g. British Institute of Cleaning Science)
- Service Level agreement and associated KPI's
- Rate card for additional work outside of core hours and duties, e.g. summer school operations, events and hospitality (details available on request)
- References
- Details of any accidents or Enforcement Notices
- Modern Slavery Policy