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GBS Modern Slavery Statement

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Policy lead (Staff member accountable)	Provost
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Related policies

- GBS Data Protection Policy
- GBS Equality and Diversity Policy
- GBS Freedom of Speech Policy
- GBS Procurement Policy
- GBS Staff Recruitment Policy
- GBS Staff Disciplinary Policy
- GBS Whistleblowing Policy

External Reference

1. Information Commissioner’s Office, Accessed online at: <https://ico.org.uk/>
2. UK Public General Acts, *Data Protection Act 2018*, Accessed online at: <https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>
3. UK Public General Acts, *Modern Slavery Act 2015*, Accessed online at: <https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>
4. Home Office, *Modern Slavery: Statutory Guidance for England and Wales (under s49 of the Modern Slavery Act 2015) and Non-Statutory Guidance for Scotland and Northern Ireland*, Accessed online at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1031731/modern-slavery-statutory-guidance-ew-non-statutory-guidance-sni_v2.5-final.pdf

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Global Banking School Modern Slavery Statement

1. Policy Statement

1.1. Global Banking School (GBS) is committed to preventing acts of modern slavery and human trafficking within its business and supply chain and imposes the same high standards on its suppliers. GBS strives to maintain high ethical principles and to respect human rights by operating ethically, sustainably, and responsibly.

1.2. GBS is committed to procuring goods and services and employing people without causing harm to others. This statement is made pursuant to *Section 54(1) of the Modern Slavery Act 2015* and constitutes GBS modern slavery and human trafficking statement.

2. Purpose

2.1 The Modern Slavery Act 2015 is a UK act of Parliament designed to tackle slavery and human trafficking through the consolidation of previous legislation and the introduction of new measures.

2.2 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.

3. GBS Governance Structure

3.1 GBS is a UK based provider of higher education working in collaborative partnerships with and delivering programmes of study awarded by Pearson, and a number of UK university partners. GBS Resources Committee oversees matters concerning priorities for investment and purchasing and reports to the Executive Board, which advises the Chief Executive Officer, Managing Director and Chairman of GBS Executive Board

4. Staff Recruitment

4.1 GBS mitigates the risk of modern slavery occurring in its workforce by ensuring that directly employed staff are recruited by following robust Human Resources recruitment policies, which are reviewed and updated on an annual basis. Staff employed on a temporary and/or hourly paid basis are also recruited and contractually employed through vigorous HR processes. Staff employed through agencies are only recruited through

established sources who can provide assurance that they comply with legislation relating to rights and welfare of their candidates and employees.

4.2 GBS Equality and Diversity Policy helps ensure that the recruitment, interview, and appointment process is fair and upholds the rights and welfare of candidates and employees.

5. Procurement

5.1 GBS Finance Department is responsible for procurement and purchasing. Procurement covers a wide range of goods, services and works for which any risk of modern slavery must be mitigated. GBS is committed to working with its suppliers to understand and assess where items originate from and what conditions the supply chain responsible for those items are working in. GBS is dedicated to working with suppliers to further develop knowledge and understanding and assist in improving conditions where possible and appropriate and operating a tendering process will help mitigate and eliminate risks.

6. Due Diligence

6.1 GBS recognises that due diligence in relation to modern slavery and human trafficking embraces a range of actions which are undertaken to mitigate to risk of non-adherence to the Modern Slavery Act 2015. These include:

- Staff to comply with the GBS modern slavery and human trafficking statement.
- Due diligence to be completed during tender exercises
- Monitoring compliance with GBS modern slavery statement
- Training of relevant staff, particularly those in the Finance Department and HR Department to promote better understanding of the risks of modern slavery and human trafficking.

7. Actions for 2022-23

7.1 GBS continuous annual monitoring and key goals:

- Continue to provide training to key GBS staff, including senior management and staff in the Finance and HR Departments
- Raise awareness amongst all staff through training and publication of relevant information on internal digital media
- Monitor, identify and assess potential risks within the supply chains used by GBS to mitigate the risk of modern slavery and human trafficking.

- Request that suppliers self-certify their compliance to the Modern Slavery Act 2015

8. Monitoring and Review

8.1 This Statement has been considered and approved by GBS Executive Board and may be amended by GBS at any time and will be reviewed annually to ensure it is fit for purpose.

8.2 Any issues related to the monitoring and review of this policy, please contact asqo@globalbanking.ac.uk.

9. Data Protection and Confidentiality

9.1 GBS is registered with the Information Commissioner's Office as a Data Controller. Details of the School's registration are published on the Information Commissioners website. GBS as a Data Controller shall implement appropriate technical and organisational measures to ensure that processing of personal information is performed in accordance with the UK General Data Protection Regulations (UK GDPR) and under the Data Protection Act 2018 (DPA).

10. Alternative Format

10.1 This policy can be provided in alternative formats (including large print, audio and electronic) upon request. For further information, or to make a request, please contact:

- **Name:** Welfare Management Team
- **Position:** Welfare Officer/Manager
- **Email:** welfare@globalbanking.ac.uk