

GBS Modern Slavery Statement

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1. Introduction

1.1 This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015¹ and constitutes GBS' modern slavery and human trafficking statement for the year ending July 2021.

1.2 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.

1.3 GBS is committed to running the organisation ethically, sustainably and responsibly. GBS strives to maintain high ethical principles and to respect human rights. GBS is committed to procuring goods and services and employing people without causing harm to others.

2. GBS Organisational and Governance Structures

2.1 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. Currently, GBS provides higher education programmes at four campuses, these are located at: Bow Road, East London; The Import Building Poplar, East London; Fazeley Studios, Birmingham; and, Universal Square Manchester.

2.2 GBS' Learning Resources Committee oversees matters concerning priorities for investment and purchasing. Learning Resources Committee reports to Executive Board, which advises the Chief Executive Officer and Chair of Executive Board.

3. Employment of Staff

3.1 GBS mitigates the risk of modern slavery occurring in its workforce by ensuring that directly employed staff are recruited by following robust HR recruitment policies, which are reviewed and updated on an annual basis.

3.2 Staff employed on a temporary and/or hourly paid basis are also recruited and contractually employed through robust 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.

3.3 GBS' Equality and Diversity Policy (<https://globalbanking.ac.uk/wp-content/uploads/2019/02/GBS-Equality-and-Diversity-Policy-V2.0.pdf>) helps ensure that the recruitment, interview and appointment process is fair and upholds the rights and welfare of candidates and employees.

¹ <https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

4. Procurement at GBS

4.1 The 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 committed to working with suppliers to further develop knowledge and understanding and assist in improving conditions where possible and appropriate. At time and where appropriate, operating a tendering process will help mitigate and eliminate risks.

5. GBS Policies

5.1 GBS places importance on its Equality and Diversity Policy² in helping to mitigate and eliminate risks of modern slavery and human trafficking. GBS's Human Resources policies and procedures ensure that workers are appointed legally with rigorous check being carried out on new appointments, part time hourly paid workers and student workers. The HR Department has responsibility for supporting and promoting equality and diversity in GBS's workforce.

5.2 GBS will be developing and adopting a *Responsible Procurement Policy* that will help ensure that decisions taken by GBs on the procurement of goods, works or services are undertaken in line with our commitments to: Delivers social value; improving environmental sustainability; promoting ethical sourcing practices; and, promoting equality, diversity and inclusion.

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 the 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 and Key Goals for 2020-21

7.1 GBS actions and key goals for the academic year 2020-21 (1st September 2020 to 31st July 2021) are as follows:

- (i) Develop, approve and implement s Responsible Procurement Policy
- (ii) Provide training to key GBS staff, including senior management and staff in the Finance and HR Departments

² <https://globalbanking.ac.uk/wp-content/uploads/2019/02/GBS-Equality-and-Diversity-Policy-V2.0.pdf>

(iii) Raise awareness amongst all staff through training and publication of relevant information on internal digital media

(iv) Monitor, identify and assess potential risks within the supply chains used by GBS to mitigate the risk of modern slavery and human trafficking.

(v) Request that suppliers self-certify their compliance to the Modern Slavery Act 2015.

8. Approval

8.1 This Statement has been considered and approved by the GBS Executive Board and will be reviewed on an annual basis.

8.2 This Statement will be published on the GBS website (<https://globalbanking.ac.uk>).

24 October 2020