

## The Board of Trustees of the Royal Botanic Gardens Kew (“RBG Kew”) Slavery and Human Trafficking Statement 2021-2022

This statement sets out the steps that the Royal Botanic Gardens, Kew (‘RBG Kew’) has taken during the financial year ending 31 March 2022 to ensure, as far as possible, that modern slavery is not taking place within its business or its supply chains. RBG Kew has a zero-tolerance approach to modern slavery and is committed to acting ethically, transparently and with integrity in all our business dealings and relationships. To our knowledge, there have been no instances of modern slavery during 2021-22.

### a) Our structure and business

We are a world-leading botanical garden, a UNESCO World Heritage Site, and one of the most biodiverse places on Earth. RBG Kew is incorporated as a non-departmental public body with exempt charitable status, established under the National Heritage Act 1983. RBG Kew makes this statement for and on behalf of itself and its wholly owned trading subsidiary RBG Kew Enterprises Limited<sup>1</sup> which provides commercial services such as retail, publishing, licensing, venue hire and commercial events. RBG Kew Enterprises Limited donates its available profits under Gift Aid to RBG Kew, thereby assisting the funding of our non-commercial, charitable activities.

RBG Kew’s structure and business is set out in greater detail in its [annual report and accounts](#). Our expenditure for 2021-22 was £84m. We are over 1000 staff and 700 volunteers.

### b) Our activity

#### *Supply chain*

RBG Kew’s standard terms and conditions for the purchase of goods and services require suppliers to comply with the Modern Slavery Act 2015, and allow for termination in the event of non-compliance. The overall risk of modern slavery in our supply chain remains low, since the majority of our procurement is undertaken through framework agreements (such as the Crown Commercial Service and the London Universities Purchasing Consortium), which have their own robust contract compliance and supplier management processes. With regards to retail, our trading activities do not generally involve high risk activities such as production and/or sourcing outside of the UK or the EU. All suppliers of products to Kew’s trading subsidiary must self-certify against a range of ethical standards, which explicitly includes modern slavery in supply chains, and we request annual updates of their supporting certification.

#### *Recruitment and our people*

We have a variety of policies and procedures in place to ensure compliance with UK employment law, and periodic internal audit reviews provide assurance on the operation of these policies. Our Human Resources team manage recruitment activities with recruiting managers and only use reputable employment agencies and job boards to source candidates. We carry out appropriate background checks including Right to Work and role-appropriate Disclosure and Barring Service checks for all fixed term and permanent appointments.

Regular meetings between management and union representatives provide structured opportunities to discuss issues affecting staff. Members of staff are also encouraged to provide feedback through an annual Staff Survey, the results of which feed into operational planning and decision-making.

#### *Policies*

RBG Kew maintains a suite of established formal policies including Anti-Slavery, Safeguarding, Ethical and Environmental Trading, Third Party Engagement, Procurement, Recruitment, and Whistleblowing. Through our Third-Party Engagement Policy, we assess and manage third party relationships, such as those with

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<sup>1</sup> RBG Kew Enterprises Limited does not meet the financial threshold which would require its own statement.

funders and donors, or scientific or commercial parties, in order to ensure that all relationships have regard to our mission, values and ethical standards. Policies are regularly reviewed and ratified by our Executive Board/trustees as applicable. The policies are communicated to all staff to inform them of the standards to which both RBG Kew staff and suppliers must adhere, and the mechanisms available to staff and suppliers to report issues/concerns. These mechanisms include the provision of a confidential, independent whistleblowing hotline, and a dedicated safeguarding email inbox.

During 2021-22, we revised our Safeguarding Policy to incorporate a greater focus on our international work, introduce a code of practice, and to detail best practice in relation to managing disclosures. The policy is available in seven languages and an easy-read format.

*Offices outside of the UK*

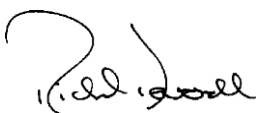
RBG Kew runs a research and conservation centre in Madagascar. Acknowledging this as an area of potential risk (given the different regulatory and legal environment in the country), we commissioned an advisory review of Finance and HR controls in operation at the site in 2021-22. We have used the findings from the review to further refine our human resources practices, and to help embed effective working structures between the London and Madagascar offices, and this work will continue in 2022-23.

**c) Our future plans**

RBG Kew is committed to the continuing evaluation and improvement of our systems and processes. Some of the planned activity for 2022-23 which will contribute towards our anti-slavery commitments includes:

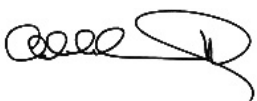
- a sustained focus on safeguarding awareness, including a new training programme launching April 2022 which contains specific modern slavery elements (for staff in relevant front-facing and international roles), and the implementation of a new Mandatory Training Policy to drive compliance with training completion, including safeguarding training
- the development of an international safeguarding framework, including a three-phase in-country safeguarding assessment at Kew Madagascar Conservation Centre. The assessment will aim to consider the wider contextual and intersectional issues within Madagascar and follow on to implement enhanced governance measures to mitigate risk both internally and in our work with partner agencies
- an internal audit of compliance (to include health and safety) is scheduled at our Madagascar site, to follow on from the audit work completed this year

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 31 March 2022. It has been approved by RBG Kew's Executive Board and Board of Trustees and signed on their behalf by:



Richard Deverell, Director, RBG Kew

14 June 2022



Dame Amelia Fawcett, Chair, RBG Kew

14 June 2022