

Royal Botanic Gardens

Kew

Anti-Slavery Policy

June 2024 v4.2

Contents

1.	Policy Definitions	2
2.	Policy Statement.....	2
3.	Policy Responsibility.....	3
4.	Policy Compliance and Reporting Concerns.....	3
5.	Policy Communication.....	4
6.	Policy Breaches	4
7.	Relevant Legislation, Standards and Guidance	5
8.	Policy Review	5
9.	Document Control	5

1. Policy Definitions

References in this policy to “we”, “us” and “our” are to the Board of Trustees of the Royal Botanic Gardens, Kew and its trading subsidiary, RBG Kew Enterprises Limited. References to “you” and “your” are to those responsible for complying with the policy, as set out under ‘Policy Compliance’ below.

Modern Slavery: is a term used to encapsulate offences in the Modern Slavery Act 2015: slavery, servitude and forced or compulsory labour; and human trafficking.

- a) **Slavery and servitude:** this is where people are dehumanised, treated as a commodity, bought or sold as “property”, have restrictions placed on their freedom or are generally exploited for someone else’s gain. Slavery often involves Forced or Compulsory Labour.
- b) **Forced or Compulsory Labour:** this is where someone is forced to work, or is otherwise controlled by an “employer”, through coercion, mental or physical abuse, or the threat of abuse.
- c) **Human trafficking:** relates to arranging or facilitating the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult.

2. Policy Statement

- 2.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person’s liberty by another to exploit them for personal or commercial gain. Modern slavery is a global phenomenon that is both inter and intra-national, affecting an estimated 50 million people worldwide¹. There is no typical victim, though it is often more prevalent amongst the most vulnerable, and within minority or excluded groups.
- 2.2 RBG Kew has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls, to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 2.3 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect and require that our suppliers will hold their own suppliers to the same high standards.
- 2.4 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, trustees, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, suppliers and business partners, all of whom have a duty to comply with this and other policies designed to prevent modern slavery.
- 2.5 RBG Kew’s [Third-party Engagement Policy](#) provides a more detailed frame of reference for how we assess and manage third party relationships in order to ensure regard for our ethics and values, which includes anti-slavery. This policy covers relationships with funders and donors, scientific and commercial parties, and other significant associations.
- 2.6 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

¹[International Labour Organization 2022](#)

3. Policy Responsibility

The Board of Trustees

- has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under its remit comply with it.
- responsibility for approving the annual Modern Slavery statement.

Audit and Risk Committee

- responsible for approving this policy and reviewing the annual Modern Slavery statement prior to approval by the Board.

Director of Resources

- responsibility for updating the policy and for producing the annual Modern Slavery statement has been delegated by the Board of Trustees to the Director of Resources.
- responsibility for ensuring the policy is implemented.

Executive Board

- Executive Board Directors have responsibility for monitoring risk in their areas and in their supply chains, and implementing effective mitigations.

Management at all levels

- responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

All staff

- everyone is responsible for acting ethically and with integrity, and raising any concerns related to modern slavery in the scope of their work.
- staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Head of Governance and Director's Office.

4. Policy Compliance and Reporting Concerns

4.1 You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or in partnership with us. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. The consequences of failing to effectively manage modern slavery risk can be significant from a regulatory and reputational perspective as well as the obvious human impact.

4.2 You must notify your manager or the Director of Resources, [raise a safeguarding concern](#), or contact the confidential [Whistleblowing Hotline](#) as soon as possible if:

- you believe or suspect that a breach of this policy has occurred or may occur in the future;
- you have any concern or suspicion that may be an issue in respect of modern slavery in any part of our business, or within the supply chains of any third-party suppliers; and / or
- you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within our own business or any part of our supply chains constitutes any of the various forms of modern slavery.

Whistleblowing Hotline (provided by RBG Kew's Internal Auditors)

Graeme Clarke, Mazars LLP, 30 Old Bailey, London, EC4M 7AU

Email: graeme.clarke@mazars.co.uk

Telephone: 020 7063 4968 (landline) or 07794 031 307 (mobile).

- 4.3 If an incident raised under the [Safeguarding Policy](#) appears to have a modern slavery component, the Head of Safeguarding will refer this to the Director of Resources and the matter will be jointly investigated and managed. Similarly, if a modern slavery incident is reported via the [Whistleblowing Policy](#), collaboration with the Head of Safeguarding will be undertaken to ensure the safeguarding needs of the victim(s) are central to any subsequent investigation.
- 4.4 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment by reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our business or in any of our supply chains.
- 4.5 Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Director of Resources immediately. If the matter is not remedied, and you are an employee, you should raise it formally in line with our [Grievance Policy](#).
- 4.6 If you wish to seek free independent advice, you can contact the following charities:

Unseen: Modern Slavery and Exploitation Helpline

Telephone: 08000 121 700

Website: www.modernslaveryhelpline.org/report

Protect: Confidential whistleblowing advice

Address: Protect, The Green House, 244-254 Cambridge Heath Road, London E2 9DA

Website: <https://protect-advice.org.uk>

Telephone advice line: 020 3117 2520.

5. Policy Communication

- 5.1 This policy is published to Kewnet for all staff and is available on Kew's public website. Awareness of the risks our business faces from modern slavery in its supply chains forms part of the induction process for individuals who work in higher risk roles such as those in front-facing services, international locations, and procurement functions.
- 5.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.
- 5.3 Our annual Modern Slavery Statement reflects the commitments outlined in this policy and is signed by the Director and the Chair of RBG Kew once approved by the Board of Trustees. The approved statement is published on the RBG Kew website, within six months financial year-end, pursuant to Section 54(1) of the Modern Slavery Act 2015.

6. Policy Breaches

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy. Breach of this policy may lead to prosecution under the Modern Slavery Act 2015.

7. Relevant Legislation, Standards and Guidance

- [RBG Kew Modern Slavery Public Statement](#)
- [Modern Slavery Act 2015](#)
- [Modern Slavery Helpline](#)
- [RBG Kew Safeguarding Policy](#)
- [RBG Kew Health and Safety Policy](#)
- [RBG Kew Grievance Policy](#)
- [RBG Kew Third Party Engagement Policy](#)
- [RBG Kew Whistleblowing Policy](#)
- [RBG Kew Procurement and Contract Management Strategy and Policy](#)
- [RBG Kew Enterprises Retail and Ethical and Environmental Sourcing Policy](#)
- [RBG Kew Recruitment Policy and Procedure](#)
- [RBG Kew Risk Management Policy and guidance](#)

8. Policy Review

Kew shall review this policy every two years, unless changes to law or guidance require earlier review.

9. Document Control

Please ensure that you are using the most up to date version of this document which is available on [Kewnet](#).

Revision history

Date	Author	Summary of Changes	Version
June 2024	R. Pan	Update to the number of people estimated to be affected by modern slavery, addition of RBG Kew's Whistleblowing Hotline details and charities who can provide independent advice. Addition of reference to procurement, retail and ethical and environmental sourcing, recruitment and risk management policies.	4.2
May 2022	L. Francis	Addition of 'Relevant Policies...' section and more explicit reference to safeguarding, third-party engagement and whistleblowing procedures.	4.1
September 2020	R. Pan	Clarification of Executive Board Director responsibility; inclusion of reference to prosecution, addition of 'Policy Review' section and minor drafting amendments.	4.0
September 2019	A. Horsley	No substantive changes.	3.1
July 2018	J. East	Policy responsibility transferred to Director of Resources; reference to annual statement and TISC registration under policy communication.	3.0
September 2017	J. East	Revised format	2.0
August 2016	M. North	Original – as agreed by Board of Trustees on 6 June 2016.	1.0

Approval history

Date	Approver	Version
June 2024	Audit & Risk Committee	4.2
May 2022	Audit & Risk Committee	4.1
September 2020	Audit & Risk Committee	4.0
September 2019	Audit & Risk Committee	3.1
September 2018	Audit & Risk Committee	3.0
September 2017	Executive Board	2.0
June 2016	Board of Trustees	1.0