

## The Board of Trustees of the Royal Botanic Gardens Kew (“RBG Kew”) Slavery and Human Trafficking Statement 2022–2023

This statement sets out the steps that the Royal Botanic Gardens, Kew (‘RBG Kew’) has taken during the financial year ending 31 March 2023 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 2022–23.

### 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, visitor programming, and marketing and digital services. RBG Kew Enterprises Limited donates its 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 2022–23 was £96m. We are over 1000 staff and 800 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.

In April 2023 our Executive Board approved our 2023 to 2028 Procurement Strategy which sets out the strategic approach to procurement for both RBG Kew and Kew Enterprises. We will ensure that our direct suppliers, and where possible their sub-contractors, are absolutely committed to preventing Slavery within their own activities and through their supply chain which includes manufacturers and producers.

#### *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 Disclosure and Barring Service checks for all fixed term and permanent appointments.

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

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. 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.

#### *Work outside of the UK*

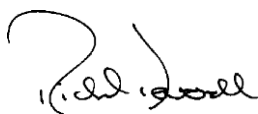
RBG Kew adheres to local laws in the countries we work in. RBG Kew runs a research and conservation centre in Madagascar. Acknowledging this as an area of potential risk (given the different regulatory and legal environment in the country), we commissioned an advisory review of Finance and HR controls 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 UK and Madagascar offices during 2022–23.

### **c) Our future plans**

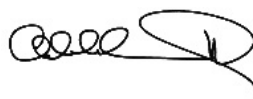
RBG Kew is committed to the continuing evaluation and improvement of our systems and processes. Some of the planned activity for 2023–24 which will contribute towards our anti-slavery commitments includes:

- a sustained focus on safeguarding awareness, including training which contains specific modern slavery elements (for staff in relevant front-facing and international roles), and the implementation of a Mandatory Training Policy to drive compliance with training completion, including safeguarding training.
- refinement of an international safeguarding framework to enhance governance measures to mitigate risk both internally within RBG Kew and in our work with partner agencies.
- April 2023 saw the appointment of an in-country Safeguarding, Security and Logistics Officer based at Kew Madagascar Conservation Centre, with oversight from Kew's Head of Safeguarding.
- an internal audit of compliance is scheduled to be completed in 2023 at our Madagascar site, to follow on from the audit work completed previously.

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 2023. It has been approved by RBG Kew's Executive Board and Board of Trustees and signed on their behalf by:



Richard Deverell  
Director, Royal Botanic Gardens, Kew  
22 July 2023



Dame Amelia Fawcett  
Chair, Royal Botanic Gardens, Kew  
22 July 2023