

The Board of Trustees of the Royal Botanic Gardens Kew (“RBG Kew”) Slavery and Human Trafficking Statement 2023–2024

This statement sets out the steps that the Royal Botanic Gardens, Kew (‘RBG Kew’) has taken during the financial year ending 31 March 2024 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 2023–24.

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 Limited¹ 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 2023–24 was £109 million. We are over 1,100 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.

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 approved 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.

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

Our revised Safeguarding Policy went live in January 2024, including a new Practical Application appendix to our work in Madagascar. The policy is available in seven languages and an easy-read format. We reached a 99.7% completion rate for our mandatory safeguarding training in 2023–24, monitored through our Mandatory Training Policy. The training contains specific modern slavery elements for staff in relevant front-facing and international roles.

Our Third-party Engagement Policy and processes provide a frame of reference for how we assess and manage third party relationships to ensure regard for our ethics and values, which includes anti-slavery. We undertook an audit of third party engagement in 2023–24 and followed up recommendations relating to oversight and links to Kew's Risk Management Policy.

Work outside of the UK

RBG Kew adheres to local laws in the countries we work in. We run 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 and a review of legal compliance in 2023. We have used the findings from these reviews to further refine our human resources practices, and to help embed effective working structures between the UK and Madagascar offices.

April 2023 saw the appointment of an in-country Safeguarding Officer based at Kew Madagascar Conservation Centre, with oversight from Kew's Head of Safeguarding, and we now have a Madagascan version of our safeguarding webinar available in Malagasy, French and English.

c) Our future plans

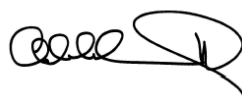
RBG Kew is committed to the continuing evaluation and improvement of our systems and processes. Some of the planned activity for 2024–25 which will contribute towards our anti-slavery commitments includes:

- a sustained focus on safeguarding awareness and further 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.
- a new Responsible Procurement Policy to replace our 'Sustainable Procurement Guidelines'. This policy will be aligned to the new Procurement Act 2023 and accompanying regulatory framework; it will recommend the adoption of the Government Buying Standards where appropriate and will provide links to guidance and training on its successful adoption. The new policy will rely upon the Social Value Model, which includes vulnerability to modern slavery threats as a consideration in relation to contract delivery.
- review and embed our Third Party Engagement Policy and processes.
- consideration of recommendations from Defra's 2024 Modern Slavery Assessment.

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 2024. It was approved by RBG Kew's Executive Board on 3 June 2024 and Board of Trustees on 20 June 2024 and signed on their behalf by:



Richard Deverell
Director, Royal Botanic Gardens, Kew
20 June 2024



Dame Amelia Fawcett
Chair, Royal Botanic Gardens, Kew
20 June 2024