



ROYAL COLLEGE OF NURSING ANNUAL MODERN SLAVERY STATEMENT FOR 2020

For the financial year 1 January to 31 December 2020

INTRODUCTION

The Royal College of Nursing (RCN) is a professional body and trade union representing over 450,000 registered nurses, midwives, nursing support workers and nursing students in the UK.

The RCN recognises that it has a responsibility to take a robust approach to slavery and human trafficking. This statement sets out our actions to understand all potential modern slavery risks related to our operations and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business or in our supply chains.

OUR STRUCTURE

RCN Council is responsible for governing the RCN. It works with its committees and country and regional boards to:

- set strategy and direction in line with our overall purpose
- ensure accountability to our members by monitoring performance and ensuring effective compliance controls are in place
- ensure that we adhere to our Royal Charter, Standing Orders, regulations and policies
- ensure effective engagement with RCN members and other stakeholders.

All Council members are elected by the members in the country, region of membership category that they represent.

RCN headquarters is in London, with main country offices in Wales, Scotland and Northern Ireland and nine regional offices across England. These offices support the activities of local RCN branches, as well as learning representatives, stewards and safety representatives in their areas.

OUR SUPPLY CHAIN

In order to run our organisation effectively we engage a number of external suppliers that are predominately UK based. The goods, works and services they provide include hosting services for our IT systems and data, software licencing and support, office maintenance and cleaning, providers of agency staff, and legal services among many others.

We recognise our supply chain as our biggest risk for exposure to modern slavery, particularly where suppliers may use low-paid or casual workers.

We require our suppliers to comply with all relevant laws and regulations and expect them to maintain the highest ethical standards in all areas of their business operations. The requirement to pay the Living Wages is in our standard services contract. If we discover one of our suppliers is allowing modern slavery offences in either their own business or their wider supply chain, we will terminate the contract and notify the relevant authorities.

POLICIES

The RCN operates the following policies that set out our approach to identifying and preventing modern slavery and human trafficking in our operations:

- **Whistleblowing policy**

We encourage all our employees, off-payroll workers, contractors, agency workers, members and Council and Board members to speak up and raise any concerns they have, which includes concerns related to the RCN's direct activities or its supply chains. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedures are designed to make it easy for individuals to make disclosures without fear of retaliation.

- **Employee code of conduct**

Our core behavioural competency framework and our standards of conduct and disciplinary rules make clear to employees the actions and behaviour expected of them when representing the RCN. We strive to maintain the highest standards of employee conduct and ethical behaviour in our operations and in managing our supply chain. We expect all others working on our behalf, such as agency workers, to follow the same principles.

- **Procurement procedures**

We have clear procurement procedures in line with our Financial Regulations.

- **Recruitment and selection policy**

We operate checks to ensure people who work for us are eligible to work in the UK and share our values and, where relevant, are suitable for supporting potentially vulnerable people. We ensure that our managers are trained in recruitment and selection, and in making work eligibility checks. Our procedure for engaging off-payroll workers ensures that we make right-to-work checks for any workers we engage.

- **Pay and reward**

The RCN recognises the GMB union and the NUJ for negotiation and consultation on pay and terms and conditions of employment. We are a member of the Living Wage Foundation and are committed to paying the 'real' living wage to all employees, including apprentices.

- **Recruitment agencies**

We use only specified, reputable employment agencies to source labour primarily through our preferred supplier list, established through a formal tender process including a pre-qualifying questionnaire to ensure the agencies are committed to working in line with our values. We always verify the practices of any new agency we use before accepting workers from that agency.

- **Safeguarding**

We have developed guidance for employees and others working on behalf of the RCN Group to recognise and report safeguarding concerns and will be introducing training to support our people to recognise and respond to safeguarding concerns.

- **RCN Modern Slavery pocket guide**

We have produced a guide to help nurses and midwives identify victims of slavery and help people find the assistance and support they need.

DUE DILIGENCE PROCESSES

We aim to buy our services through well-established companies and organisations. We have in place procurement processes and templates that prompt us to consider modern slavery at different points during the processes. Our standard contract terms and conditions include modern slavery requirements. We monitor key suppliers as part of contract management to ensure they comply with our contractual requirements, particularly those contracts where we believe there may be greater risk of modern slavery or human trafficking offences occurring.

We have reviewed our supply chain to ensure that companies with a turnover of over £36m have modern slavery statements in place. In 2020, 90% of the RCN's total supplier spend was made to 7% of our total supplier base. We have reviewed the published Modern Slavery Policies for these suppliers (100 in total). Of the top 100 suppliers, 60 have published modern slavery statements. If no policy is publicly available, we are in the process of contacting the remaining suppliers to seek assurance that they comply with the Modern Slavery Act 2015. We believe that the majority of the 40 remaining suppliers have a turnover below the £36m threshold set in the Modern Slavery Act 2015 and so are not required to publish a modern slavery statement.

TRAINING

The RCN ensures that all employees understand the standards of behaviour expected of them and ethical ways of working. Employees also receive information and/or training on the rules, policies and procedures they are expected to follow relating to their work, to ensure that we comply with legislation and good practice.

RCN COUNCIL APPROVAL

This statement was approved on 29 July 2021 by RCN Council who review and update it annually.

Signed by: 

Carol Popplestone, Interim Chair of RCN Council

Date: 29 July 2021