



ROYAL COLLEGE OF NURSING GROUP ANNUAL MODERN SLAVERY STATEMENT FOR 2021

For the financial year 1 January to 31 December 2021

INTRODUCTION

This statement is made according to section 54(1) of the Modern Slavery Act 2015 and constitutes the RCN's slavery and human trafficking statement for the financial year ending 31 December 2021. It fulfils one of the commitments set out in the RCN Group Equality, Diversity and Inclusion Statement.

The RCN Group (“the Group”) constitutes the Royal College of Nursing (RCN), RCNi and the RCN Foundation.

The RCN is a professional body and trade union representing close to half a million registered nurses, midwives, nursing support workers and nursing students in the UK. RCNi is a wholly owned subsidiary of the RCN which provides an essential nursing resource, inspiring and informing the whole nursing team to deliver best practice and exceptional patient care. The RCN Foundation is an independent charity that supports the needs of nurses, midwives and health care assistants as well as nursing students.

The Group recognises that it is responsible for taking 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 put in place steps aimed at ensuring there is no slavery or human trafficking in our own business or 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 or membership category that they represent.

RCNi has an independent Board comprising executive and non-executive directors.

RCN Foundation is governed by an independent committee.

RCN Group headquarters is in London, with main RCN 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, the RCN engages 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 workers, and legal services among many others. RCNi also utilises overseas suppliers for the hosting and production of its products and services.

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 real Living Wage is in the RCN's 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 following policies, procedures and guidance documents set out our approach to identifying and preventing modern slavery and human trafficking in our operations:

- **Group Whistleblowing policy**
Our whistleblowing procedures are designed to make it easy for individuals to make disclosures without fear of retaliation. We encourage all our people – including employees, off-payroll workers, contractors, agency workers, members and Council and Board members - to speak up and raise any concerns they have, including concerns related to our direct activities or our supply chains. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.
- **Employee code of conduct**
Our core behavioural competency framework, standards of conduct, and disciplinary rules make clear to employees the actions and behaviour expected of them when representing the RCN Group. We strive to maintain

the highest standards of conduct and ethical behaviour in our operations and 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 ensuring that our suppliers are carefully selected and evaluated against strict criteria.

RCNi has trained its managers in the procurement procedures.

- **Recruitment and selection / People resourcing policy**

We operate checks to ensure people who work for us are eligible to work in the UK, share our values and, where relevant, are suitable for supporting potentially vulnerable people. We ensure that our hiring 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, and RCNi recognises the NUJ, for negotiation and consultation on pay and terms and conditions of employment. The RCN is 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 the RCN's 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. We will introduce training to support our people in recognising and responding to safeguarding concerns.

- **Trade union recognition**

We consult and negotiate with recognised trade unions on proposed changes to employment, policies and procedures and any contractual matters.

- **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 goods and services through well-established companies and organisations. The RCN have procurement practices and templates that prompt us to consider modern slavery at different points during the processes. The RCN's standard contract terms and conditions include modern slavery requirements. As part of contract management, we monitor key suppliers to ensure they comply with our contractual requirements, particularly those contracts where we believe there may be a 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 2021, 90% of the 'RCN's total supplier spend was made to 8% of our total supplier base. We have reviewed the published Modern Slavery Policies for these suppliers (100 in total). Of the top 100 suppliers, 65 have published modern slavery statements. Where 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 35 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 Group ensures that all staff understand the standards of behaviour expected of them and ethical ways of working. Staff 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.

THE IMPACT OF COVID-19 ON MODERN SLAVERY RISK

The COVID-19 pandemic has heightened the risk of modern slavery. We remain vigilant to potential COVID-19-related risks relevant to our stance on modern slavery throughout the pandemic, in line with UK government guidelines published in April 2020.

Across our operations, we did not compromise existing due diligence standards in recruitment. The RCN's existing suppliers would have already been subject to our modern slavery due diligence processes. We continued to maintain payment schedules where a service was not being received directly as a result of the pandemic, and where contractors' staff have been furloughed, making payments to ensure contractors' staff were not disadvantaged. Effort has also gone into ensure payments are made in a timely manner wherever possible despite the challenges of remote working.

We remain committed to monitoring and mitigating modern slavery risks in our operations and supply chain.

For more information on our full response to COVID-19, please see our 2021 Annual Report.

APPROVAL

This statement was prepared with input from the RCN People and OD and Finance departments and RCNi's Head of HR and Corporate Business Manager.

It was approved by the RCN Chair of Council:

A handwritten signature in black ink that reads "C Popplestone." The signature is written in a cursive style and is positioned above a light grey rectangular background.

Carol Popplestone, Chair of RCN Council

06 May 2022