



ROYAL COLLEGE OF NURSING GROUP ANNUAL MODERN SLAVERY STATEMENT FOR 2022

For the financial year 1 January to 31 December 2022

INTRODUCTION

This statement is made according to section 54(1) of the Modern Slavery Act 2015 and constitutes the RCN Group's slavery and human trafficking statement for the financial year ending 31 December 2022. It fulfils one of the commitments set out in the RCN Group Equality, Diversity, and Inclusion Statement (2021).

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

The RCN is a professional body and trade union representing over 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 resources and events, inspiring and informing the whole nursing team and associated health professionals 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

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. The RCN Group provides training in the prevention of fraud, bribery, corruption, and money laundering to mitigate the risk of modern slavery offences. 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.

- **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 is 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 and RCN Modern Slavery wheel**

We have produced guides 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.

In 2021 RCN reviewed its supply chain to ensure that companies with a turnover of over £36m have modern slavery statements in place. In 2022, 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). 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. This exercise will be carried out again by our finance team in 2025, and the review will be subject to an internal audit.

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.

APPROVAL

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

It was approved by the General Secretary and Chief Executive:



Pat Cullen, General Secretary and Chief Executive

DATE

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