

The Royal Veterinary College - Slavery and Human Trafficking Statement for the Financial Year ending 31 July 2021

Introduction from the Chair of Council

The Royal Veterinary College (RVC) is the largest and longest-established vet school in the English-speaking world and is a Member Institution of the University of London.

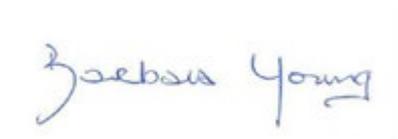
Given the pedigree and core values and ethics of the RVC, we are proud of the steps we take to help combat slavery and human trafficking. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. We are committed to improving our practices to combat modern slavery and human trafficking.

The RVC offers undergraduate and postgraduate programmes in veterinary medicine, veterinary nursing, and biological sciences; and CPD programmes in veterinary medicine and veterinary nursing. The RVC produces world-class research and provides support for the veterinary profession through its referral hospitals, which includes the Queen Mother Hospital for Animals, Europe's largest small animal hospital. Our programmes are of international appeal and attract students who go on to become practicing veterinarians, research scientists, veterinary nurses and leaders in industry and government we currently hold full accreditation from AVMA, RCVS, AVBC, EAEVE and the Royal Society of Biology.

As one of the world's leading specialist veterinary and biological science research institutions, the RVC brings together talented individuals; all of whom share a passion for human and animal health and welfare.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes RVC's slavery and human trafficking statement for the financial year ending 31st July 2021.

Baroness Young of Old Scone, Chair of RVC Council



Date: 24th November 2021

Organisational structure

The RVC is a UK based higher education provider of undergraduate, postgraduate and CPD programmes registered with the Office for Students. The RVC has over 2400 students and approximately 1020 staff and is structured into three academic departments: Clinical Science & Services; Comparative Biomedical Sciences; Pathobiology and Population Sciences. These academic departments are supported by professional service departments, as follows: Academic Registry, the Secretariat, Infrastructure Services, Human Resources, Learning and Wellbeing, External Relations, Finance, Research Administration and Access & International Engagement.

The RVC provides support for veterinary and related professions through our Clinical facilities: the Queen Mother Hospital for Animals, the Beaumont Sainsbury Animal Hospital and RVC Equine. The RVC also owns and operates Boltons Park Farm. The Animal Care Trust (ACT) is the RVC's registered charity. For more than 30 years the Trust has been dedicated to raising funds to support a wide range of activities aimed at improving animal health and care.

The RVC has four subsidiary companies. The London BioScience Innovation Centre (LBIC) and was London's first centre for early-stage life science companies and places the RVC at the heart of biotechnology and other biomedical research in London providing opportunities for research collaboration and engagement with industry. RVC Veterinary Practices Limited operates a first opinion practice in Bedford providing veterinary services to clients and training for RVC students.

The RVC has two dormant subsidiary companies: RVC Developments Ltd and Royal Veterinary College (Hong Kong) Ltd.

Our policy on slavery and human trafficking

We are committed to ensuring that we do not knowingly contract with any supplier that is directly in breach of UK modern slavery or human trafficking regulations. In light of the obligation to report on measures to ensure that all parts of our business are slavery free, we continue to review our policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues. This reflects our commitment to acting ethically and with integrity in all our business relationships and implementing and enforcing effective systems and controls to mitigate against slavery and human trafficking risks where possible, consistent with our status as an exempt charity.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we have policies and processes to:

- Identify and assess potential risk areas with key contracted suppliers and research partners (Procurement policies and procedures and Research policies & procedures)
- Protect internal whistle blowers (Public Interest Disclosure)
- Carry out due diligence on collaborative taught provision and research partners and sub-contractors (Research Due Diligence Policy/ Academic Quality Processes for Collaborative Provision)

Supplier adherence to our values

We operate a zero-tolerance policy to slavery and human trafficking. To ensure that all key suppliers comply with our values, we are and continue to review our agreements and dealings with core suppliers to ensure compliance with anti-slavery measures. The implementation of our modern slavery compliance programme during has included:

- All major tenders that were undertaken during the past year where the Strategic Procurement Unit was involved as part of the tender project team incorporated a mandatory pass/fail clarification question with regards to the Modern Slavery Act and compliancy with the Act by bidders where appropriate.
- The implementation of a new Research Due Diligence Policy.
- The use of model clauses as part of the RVC's Standard Terms and Conditions of Purchase contract document for supplier agreements requiring compliance with anti-slavery measures, as appropriate.
- The use of external HE consortium frameworks in particular the London Universities Purchasing Consortium (LUPC). As part of its due diligence process in running and setting up framework agreements for member organisations, LUPC have made positive progress to develop actions to identify, prevent and mitigate the risks of modern slavery and human trafficking in the supply chain of LUPC members using its framework agreements. As part of its commitment in this area, the LUPC is a co-founder of an NGO organisation called Electronics Watch, a collaborative organisation that monitors the global electronics supply chains in terms of compliance of a number of key Original Equipment Manufacturer (i.e. Dell) brands with regards to relevant wage, working hour, occupational health and safety, environmental and human rights legislation and regulations. As a member of the LUPC, the College has free affiliate membership of Electronics Watch. LUPC have also started to develop its own supply chain mapping tool primarily in relation to high-risk sector suppliers, with the view to better understand the origin of the products and services used by members through supplier contracts awarded under frameworks set-up by the consortium. This provides the RVC with greater assurance over the quality of some of the suppliers used in the future, where appointed through relevant framework agreements.
- A COVID Working Group was set up to review arrangements with external education partners and its work has proved beneficial in terms of improving the review of each of these arrangements. It has therefore been agreed to formalise the group to continue its work in assessing and improving arrangements for collaborative provision.
- The Modern Slavery Compliance Group which now meets annually to oversee our assessment of risk and any mitigating actions with regard to the Modern Slavery Act 2015. The group is led by the College Secretary and has representatives from the following areas of responsibility: Governance; Human resources; Procurement; Finance; Academic Quality; Research. the next review meeting and risk assessment will take place in March 2022.

Training

The College Secretary, Head of Procurement and ISD Procurement Category Managers attend relevant seminars and workshops run by a few of the consortiums a couple of time a year, aimed at sharing best practice relating to Modern Slavery and other responsible procurement initiatives, as appropriate. In the last year we have also engaged directly with Electronics Watch to understand more about their work and risks and mitigations in the electronic supply chains.

Key Performance Indicators (KPIs)

Aggregated spend per supplier	FY2020/21		Controls
	Number of suppliers	Total spend	
£189,330 and above	29 (2.1%)	£26.9M (63.7%)	OJEU tenders and/or tenders under LUPC or other consortium Frameworks
£100k - £189,330	23 (1.7%)	£3.2M (7.6%)	Below OJEU threshold tenders run either outside of or under LUPC or other consortium Framework
£50k - £100k	56 (4.2%)	£4.0M (9.5%)	Below OJEU threshold tenders run either outside of or under LUPC or other consortium Frameworks
£25K-£50k	74 (5.5%)	£2.7M (6.4%)	Below OJEU threshold tenders run either outside of or under LUPC or other consortiums Frameworks LUPC or other consortiums. At times also simply undertaken by way of competitive benchmarking, where appropriate.
£0-£25k	1,166 (86.5%)	£5.4M (12.8%)	Competitive quotes, as appropriate.
Total	1,348	£42.2M	

- We have good controls in place for approximately 71% (+8% on last year) of our expenditure which relate to our significant suppliers (in terms of expenditure) and we are developing controls as per the comment below to start addressing other areas.
- An automated new supplier form and workflow process is currently in development between the Assistant Director of Finance (Financial Services) and Finance Systems which will include a modern slavery supplier self-declaration question/statement applicable to all new suppliers irrespective of level of spend. However, as an interim measure, the current manual new supplier forms have been recently updated to include Modern Slavery Act, Corporate Social Responsibility, Equality Act, and Off-Payroll Working related supplier self-declarations to address multiple governance and best practice related measures into a single document for all levels of supplier spend.

Further steps

Following a review of the effectiveness of the steps we have taken to try and ensure that the College's core suppliers and research partners that it contracts with are not directly engaged in slavery or human trafficking, we intend to take the following further steps to combat slavery and human trafficking:

- Continued review of relevant RVC policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues
- Automate the new supplier form and process to put in place modern slavery, Corporate Social Responsibility, Equality Act, and Off-Payroll Working related supplier self-declarations to address multiple governance and best practice related measures into a single document at all levels of supplier spend.
- Continue to assess sector practice to try and ensure we are in line with developments and best practice, as appropriate
- Continued Promotion of LUPCs responsible procurement e-learning portal to staff involved in procurement and research activities
https://www.lupc.ac.uk/Responsible_Procurement
- Review our arrangements with contracted services to understand more about their supply chain approaches (e.g. Catering and Fair Trade) and employment practices (e.g. Real or London Living wage).
- Identifying any other gaps in our coverage of suppliers, partners and other key relationships.