

# The Royal Veterinary College - Slavery and Human Trafficking Statement for the Financial Year ending 31 July 2024

# Introduction from the Chair of Council

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

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.

Given the pedigree and core values and ethics of the RVC, we are proud of the steps that we take to 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.

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 31<sup>st</sup> July 2024.

# Baroness Young of Old Scone, Chair of RVC Council

Date: 27<sup>th</sup> November 2024

#### **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 2,400 students and approximately 1,100 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 and Innovation.

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) 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.

In the event that an RVC supplier is identified to potentially be in breach of modern slavery regulations, we would aim to work with the relevant supplier to discuss reasonable measures that they can take to investigate and identify possible risk areas and for the supplier to then be given the opportunity to provide an appropriate remedial plan of action to address any breach. Where a material breach of the modern slavery regulations by a contracted supplier is identified by the RVC and not rectified by the relevant supplier within a reasonable time period, the RVC shall exercise its zero-tolerance policy to slavery and human trafficking and commence due process to initiate termination of an offending supplier contract in accordance with appropriate terms and conditions of contract.

# Due diligence processes for slavery and human trafficking

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

- Identify and assess potential risk areas with key contracted suppliers (Procurement policies and procedures)
- Carry out due diligence on collaborative taught provision and research partners and sub-contractors (Due Diligence and Relationship Review Policy/ Academic Quality Processes for Collaborative Provision)
- Protect internal whistleblowers and create channels for reporting and escalating concerns from individuals associated with the RVC (Public Interest Disclosure)

### Supplier adherence to our values

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

- All major tenders that were undertaken involving the Strategic Procurement Unit incorporated a mandatory pass/fail clarification question with regards to the Modern Slavery Act and compliancy with the Act by bidders, where appropriate.
- The review of Due Diligence and Relationship Review Policy to assess collaborative research partners and sub-contractors.
- Due diligence enquiries are carried out on new collaborative taught arrangements prior to contract signature, as well as on existing collaborative taught arrangements. These consider ethical issues including review of corporate information regarding any published Modern Slavery statements and reports. Collaborative partners contractually undertake, warrant, and represent that they, and their officers, employees, agents and subcontractors, have and will continue to comply with the Modern Slavery Act 2015 and will notify RVC immediately should they become aware of a breach or potential breach under these obligations.
- 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 antislavery measures, as appropriate.
- The requirement that all new suppliers are required to complete a Modern Slavery Act and Equality Act self-declaration, as part of the requirements of the new supplier request application process.
- The use of external HE framework agreements, in particular the London Universities Purchasing Consortium (LUPC), and other appropriate public sector consortium frameworks. As part of its due diligence process in running and setting up framework agreements for member organisations, the 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. The LUPC is a co-founder of a Non-Governmental Organisation (NGO) 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 (e.g., 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 RVC has free affiliate membership of Electronics Watch. The LUPC is developing its own supply chain mapping tool primarily in relation to high-risk sector suppliers, with

the view to better understanding the origin of the products and services used by members through supplier contracts awarded under frameworks set-up by the consortium. This will provide the RVC with greater assurance over the quality of some of the suppliers used in the future, where appointed through relevant framework agreements.

- The development of a modern slavery toolkit for suppliers, recently completed, is
  intended to act as a guideline for suppliers to implement a strategy for their business
  and their supply chains to tackle modern slavery. The toolkit has been initially issued
  to the top20 trade suppliers by spend to gauge their response to the requirement to
  submit a short self-declaration questionnaire to better understand the measures and
  actions that their organisation has put in place to address and manage any potential
  modern slavery related risks within its supply chain.
- The Modern Slavery Compliance Group meets annually to oversee our assessment of risk and any mitigating actions with regard to the Modern Slavery Act 2015. The Group, led by the Head of Procurement, has representatives from the following areas of responsibility: Governance; Human Resources; Estates, Procurement; Academic Quality and Research.

# Training

The Head of Procurement and ISD Procurement Category Manager attend relevant seminars and workshops run by purchasing consortia, aimed at sharing best practice relating to Modern Slavery and other responsible procurement initiatives, as appropriate.

# **Further steps**

Following a review of the effectiveness of the steps we have already taken to seek to ensure that the RVC's suppliers, research, and other 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.
- Continue to assess sector practice to seek 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.
- Continued review of 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).
- Follow-up with relevant top20 trade suppliers to submit their self-declaration response to the modern slavery toolkit for suppliers' questionnaire to ensure that a minimum level of safeguards is in place in relation to compliancy with modern slavery guidelines by each of the key suppliers.
- Identifying any other gaps in our coverage of suppliers, partners and other key relationships, where possible.