



The Institute of Cancer Research (ICR)

Modern slavery statement for financial year 2022/2023

Introduction

This statement is made pursuant to the requirements of Section 54 Part 6 of the Modern Slavery Act 2015 and sets out the steps that ICR has taken and will continue to take/plans to take to identify, prevent and mitigate the risks associated with modern slavery in our business.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. ICR is committed to acting ethically with integrity and transparency in all business dealings and continues to put effective systems and controls in place to safeguard against any form of modern slavery taking place within our procurement, contract management and supply chain management operations.

Our organisation

The Institute of Cancer Research, London, is one of the world's most influential cancer research institutes, with a mission to make the discoveries that defeat cancer. We are also a College of the University of London and an exempt charity. Our vision is a world where people can live their lives free of cancer as a life-threatening disease.

The ICR is a company limited by guarantee, incorporated in 1954. It is also a college of the University of London and adheres to regulations set by the Office for Students. The overall governing body is its [Board of Trustees](#) who are responsible for ensuring it pursues its charitable objects, complies with its constitution and relevant legislation and regulations, applies its resources exclusively to its objects, and enacts cancer research of the highest international standard. The Trustees carry the responsibility of company directors of the ICR.

The Chief Executive and President of the ICR is responsible to the Board of Trustees for the overall direction of the organisation's management, research and academic activities, the effective prosecution of its work and for recommending the allocation of resources.

The CEO is assisted in his work by the Executive Board, which is responsible for formulating strategies, plans and budgets for approval by the Board of Trustees.

Our spend categories and high risk areas

The ICR's workforce comprises of highly educated professional occupations and does not directly employ the categories of staff which are generally seen to be vulnerable to modern slavery in this country (unskilled domestic, agricultural and factory workers). Therefore, the focus is to ensure safeguards in our relationships with contractors and suppliers.

ICR's supply chains mainly fall under four categories, which are:

- Laboratory Consumables and Equipment
- Professional Services
- ICT Equipment and Services
- Estates Goods and Services

The main categories that we believe carry higher risks are office supplies, laboratory consumables and equipment, ICT equipment and some estates services, such as cleaning and security services. ICR continues to work on categorisation and identifying risk involved with its categories. Most of our contracts in these risk areas are sourced through the London Universities Purchasing Consortium (LUPC), and the consortium has focused resources on these areas.

Our due diligence processes and steps taken to mitigate the risk

The ICR has identified the main categories of goods and services that present higher risk of human rights abuses. We will continue to advance our knowledge and understanding of these risks in collaboration with the LUPC and continue to progressively find and implement strategies to address such risks. In some cases, such as cleaning, catering and security services, we continue to work in collaboration with our suppliers and consortium to protect workers from human rights abuses.

Across all our higher-risk spend categories, we communicate for wider benefit those due diligence processes that we find to be the most successful and continue to apply them across the board. Modern slavery remains a training need, and we have continuous training for the procurement element and continue to develop wider awareness across the institute's departments and all staff.

Most of our LUPC suppliers in these higher-risk categories have committed to the [Base Code](#) of the [Ethical Trading Initiative](#) (ETI), which ICR fully supports and is founded on the conventions of the International Labour Organisation (ILO) as well as being an internationally recognised code of labour practice, requiring that:

- Employment is freely chosen;
- Freedom of association and the right to collective bargaining are respected;
- Working conditions are safe and hygienic;
- Child labour shall not be used;
- National Living wages are paid;
- Working hours are not excessive;
- No discrimination is practised;
- Regular employment is provided; and
- No harsh or inhumane treatment is allowed.

The ICR is affiliated to [Electronics Watch](#), the independent monitoring organisation that aims to improve workers' conditions in global electronics supply chains. This affiliation and continuous collaboration with LUPC, fellow members and the wider sector enhances our focus on responsible procurement and support work to mitigate human rights abuses in supply chains.

Our policies

ICR is committed to acquiring goods and services ethically without causing any harm to others. As such, we remain committed to the UK Government's [National Action Plan](#), updated in May 2016, to implement the UN Guiding Principles on Business and Human Rights.

We also operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Modern slavery – Our modern slavery statement sets out the organisation's stance on modern slavery and our continuous work to develop in this area.
2. Recruitment policy – we operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

3. Whistleblowing policy – we operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct – this code explains the way we behave as an organisation and how we expect our employees and suppliers to act.

As a member of the LUPC, we share common consortium values when it comes to responsible procurement. We conform to the current LUPC [Responsible Procurement Policy](#) which is shared by all purchasing consortia that make up Procurement England Limited which is our vehicle for national, developmental collaboration in procurement in English higher education.

We collaborate closely with LUPC and have a representative on the LUPC's Responsible Procurement Advisory Group. We believe that such collaborations will derive faster impact in minimising modern slavery.

Our suppliers

ICR's procurement follows one of two paths:

1. A collaborative route, through purchasing consortia; or
2. Our in-house tendering and contracting process.

ICR actively engages with the LUPC and Higher Education Procurement Association (HEPA) to support the inclusion of ethical sustainability, including addressing slavery and human trafficking, in their procurement programmes.

Our in-house tendering and contracting processes include some prequalification clauses which address the National Living Wage, and all our soft service contracts now include this requirement. Our modern slavery statement is embedded in our tendering process. Suppliers are evaluated for compliance through our standard Selection Questionnaire (SQ). The ICR standard terms and conditions include clauses covering modern slavery and human trafficking.

We are continuously reviewing how we assess the risks and monitor progress with mitigation. We continue to explore how best we can use the global slavery index in our selection process and also looking into ways of engaging our suppliers better.

Training, capacity building and contribution to wider policy development

We regularly conduct training for our procurement team. All ICR's procurement professionals have taken and passed the HEPA sustainability and the supplier due diligence & risk management modules. Most of our Facilities Services staff successfully completed an Environmental Sustainability Skills for the Workforce course which covered the modern slavery act. We continue to engage with our HR and Communications team, consortia, and external stakeholders in a drive to engage and create more awareness around modern slavery.

ICR continues to have representation on the LUPC Responsible Procurement Advisory Group (RPAG), comprising Education Institutional procurement and sustainability managers and students. The LUPC [Responsible Procurement Policy](#) was updated in 2020 and LUPC [Strategic Plan](#) was updated in 2022. The ICR Responsible Procurement Code was updated in 2022. The Policy commits LUPC to joining [Advanced Procurement for Universities and Colleges \(APUC\)](#) in using the [Sustain Supply Chain Code of Conduct](#). ICR through its partnership with LUPC commits to supporting projects and actions set out by the strategy.

The LUPC has been working collaboratively with the APUC to develop a supply chain evaluation tool (previously called Sustain). The tool is designed to gather information from suppliers to assess and understand their ethical, social, economic and environmental standards and practices, with a view to improving standards by encouraging change and providing support with action plans and follow up reviews. LUPC conducted a test of the tool under the Waste Management Services framework agreement and has included the roll out of the tool in the General Laboratory Equipment, Legal Services, and the Estates and Facilities management framework agreements. The ICR remains supportive of this development and the benefits this evaluation tool will bring.

We continue to provide and promote the HEPA modern slavery eLearning module. The module looks at the human rights issues faced in the supply chain, the module has been placed on ICR's intranet for wider use. All procurement staff have completed the module.

Plans for the future – ICR Goals for 2023 – 2024

ICR will continue its commitment to the Modern Slavery Act 2015 by raising awareness and providing training across the institute's departments and to all staff.

To continually review the ICR Responsible Procurement Strategy, ICR Responsible Procurement Policy and Responsible Procurement Code to ensure these are up-to-date and continue to reflect best practice.

To continue our commitment to better understand our supply chains and working towards greater transparency and responsibility towards people working on them. For our existing contracts, we will continue to identify specific supply chains that we feel represent a medium to high risk of modern slavery, human trafficking, forced and bonded labour, and labour rights violations. We will continue to monitor and work with our suppliers to encourage more of them to commit to managing the risks to human rights in their supply chains.

We will continue to identify actions in partnership with our purchasing consortium LUPC and look at collaboration with other groups such as NGOs and Charities in our continuous effort to mitigate modern slavery risk and improve best practice. We will continue to work closely with LUPC and draw on their knowledge and resources to support ICR work.

Approval for this statement

This statement was approved and published by the ICR Board of Trustees and will continue to be reviewed at least once annually.

Professor Kristian Helin
Chief Executive and President
The Institute of Cancer Research



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