

The Institute of Cancer Research (ICR)

Modern slavery statement for financial year 2017/18

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 continues 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 Higher Education Funding Council for England (HEFCE). 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 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 the 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 are developing new approaches in collaboration with our suppliers and consortium to protect workers from human rights abuses. We have carried out a review of our existing catering and new waste management contract and made modern slavery inclusions. Across all our higher-risk spend categories, our intention is to 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 have embarked on continuously training the procurement element and developing wider awareness strategy across the institute's relevant 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.

In April 2018 ICR was 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 will enhance 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 manner in which 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 [Sustainable 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 the 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 will 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 have and now include clauses covering modern slavery and human trafficking.

We are continuously reviewing how we assess the risks and monitor progress with mitigation. We are also exploring 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. In November 2016, all of ICR's procurement professionals took and passed the HEPA sustainability and the supplier due diligence & risk management modules. Our sustainability champion has attended the one-day training course for procurement professionals and other managers in higher education, delivered by the Business, Human Rights and the Environment Research Group (BHRE) for HEPA. We are engaging with our HR, Communications team, consortia and external stakeholders in a drive to engage and create more awareness around modern slavery.

ICR continues to have a representative on the LUPC Responsible Procurement Advisory Group (RPAG), comprising procurement and sustainability managers and students. In 2017, the group approved a new Responsible Procurement Policy and Strategy. ICR through its partnership with LUPC commits to the ambitious programme of projects and actions, set out by this strategy to mostly focus on addressing the risks of human rights abuse in our supply chain. The Policy commits LUPC to joining Advanced Procurement for Universities and Colleges (APUC) in using its Supply Chain Code of Conduct. We continue committed to our membership of the LUPC RPAG with the aim of recommending responsible procurement

policy and strategy, which will determine our responsible procurement priorities moving forward.

In 2018, the ICR joined the LUPC and a small group of participants drawn from local government and higher education in piloting a new supplier engagement tool called Equiano. The tool is designed to gather information from suppliers when conducting human rights due diligence in supply chains to help identify risks of human rights abuses in public supply chains. The pilot included suppliers identified by ICR who received questionnaires. The supplier submissions have now been assessed and a report highlighting risks identified and recommended actions is being reviewed by ICR.

Our procurement staff are in the process of completing the HEPA eLearning module titled Protecting Human Rights in the Supply Chain. This module looks at the human rights issues faced by organisations in the supply chain.

Plans for the future

ICR continues its commitment to better understanding its 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 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 also look at collaboration with other groups such as NGOs and Charities in our continuous effort to mitigate modern slavery risk and improve best practice.

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 Paul Workman
Chief Executive and President
The Institute of Cancer Research

Signature: 

Date: 21 December 2018