

Modern Slavery Policy

STATUS: Approved

Policy Owner:

Head of Human Resources and OD

Date approved: 09 June 2026

Next Review Date: 2027

1 Purpose, scope and context

- 1.1 This policy sets out the Royal Institution's ('Ri') position on Modern Slavery and it applies to all areas of the Ri's activities and to all stakeholders, internal and external. Although not required to do so under the Modern Slavery Act 2015, the Ri is committed to adhering to the legislation and clarifying policy. Modern slavery is a serious crime that violates human rights. The Ri considers all forced or compulsory and/or child labour, servitude and human trafficking to be a form of modern slavery. Victims are forced, threatened or deceived into situations of subjugation, degradation and control which undermine their personal identity and sense of self.

2 Governance and Responsibilities

- 2.1 The policy is owned by the Head of Human Resources (HR) and scrutinised by the Audit and Risk Committee which recommends the policy to the Board of Trustees for approval.
- 2.2 All employees have a duty and responsibility to follow this policy at all times. A breach of this policy and/or relevant HR policies may lead to disciplinary action.

3 Policy statement

- 3.1 Modern slavery is a serious crime. No form of modern slavery is tolerated. The Ri strives to act in an ethical and responsible way in all that we do. We strive to identify and challenge any practices that indicate the others are being exploited, abused, trafficked or forced into labour. This includes through our supply chains and partnerships with external organisations, donors and employment practices.
- 3.2 Trustees are mindful of their responsibilities to consider the risks of modern slavery in all relevant governance decisions including investment policies.
- 3.3 It is the policy of the Ri that all employees and contractors are responsible for speaking out if they come across any evidence, suspicion or indication of modern slavery practices.
- 3.4 The Ri fully complies with legislation applicable to the hiring and protection of employees within the workplace and compensation for work undertaken including Health and Safety legislation and minimum wage. The Ri does not consider there is a risk of modern slavery being present in its directly employed workforce however we will regularly review our policies and practices.
- 3.5 As an employer, the Ri ensures that our Human Resources remuneration policies are fair and based on external salary benchmarking, that we take care to ensure that internships and voluntary posts are non-exploitative and that rights to work are carefully checked.

- 3.6 The Ri's employment policies directly prohibit practices that could be construed as modern slavery. We do not employ any person under 16 years of age, do not pay cash for any employed or contracted service and do not support unpaid internships or volunteer opportunities without reasonable agreed expenses being repaid.
- 3.7 This policy will be reviewed tri-annually or in accordance with changes in legislation or relevant guidance.

4 Reporting

- 4.1 Any information about possible or proven modern slavery must be reported by staff to their line manager and to HR without delay. Line managers are expected to report any such matters to the relevant Director promptly.
- 4.2 Evidence of criminal activity must be reported to the Police without delay by HR or the relevant Director. Consideration must also be given to reporting relevant safeguarding concerns to the Designated Safeguarding Officer (DSO) in addition to but not instead of reporting the matter to the Police.
- 4.3 Any report of modern slavery and the actions taken must be reported to the Audit and Risk Committee through the Governance team.

In all cases where concerns are raised the paramount concern must be the safety of the person(s) at risk and expert advice sought before any course of action is taken.

5 External contractors and partnerships

- 5.1 The Ri recognises that contractors, partners, tenants and sub-contractors have the same duty to comply with all relevant employment legislation. The Ri will ensure that as part of due diligence we will:
 - Assess sub-contractors' Modern Slavery policy or relevant employment policies
 - Assess additional risks from the use by contractors of sub-contractors/ casual staff and in supply chains
 - Be alert to and report any specific known risks of contracted work being carried out outside of the U.K
 - Be alert to additional risk when working with, tendering or considering partnerships with high risk industries, e.g., catering, construction, security and hospitality.
- 5.2 The Ri practices due diligence in the appointment of suppliers and procurement contracts as well as the management of grants.
- 5.3 An up to date due diligence process also underpins our Donations Acceptance policy and the Ri Scrutiny Committee is convened by the Audit and Risk Committee where the question of acceptance or return of a donation arises from this policy.
- 5.4 Specific decisions around the continuation of contracts and/or partnerships may require referral to the Audit and Risk Committee.

5 Relevant policies:

- Anti-Fraud and Bribery
- Child Safeguarding/ Adult Safeguarding
- Disclosures in the Public Interest (Whistleblowing)
- Donations Acceptance
- Health and Safety
- Investment
- Staff Handbook – including recruitment and induction policies