

## Modern Slavery statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. It constitutes the human trafficking statement for Historic Royal Palaces and Historic Royal Palaces Enterprises Limited for the financial year that ended 31 March 2021.

Historic Royal Palaces is the independent charity that looks after the Tower of London, Hampton Court Palace, Banqueting House, Kensington Palace, Kew Palace and Hillsborough Castle and Gardens.

We are a team of people who love and look after six of the most wonderful palaces in the world.

We create space for spirits to stir and be stirred. We want everyone to feel welcome and accepted. We tell stories about the monarchs you know and the lives you don't. We let people explore and we set minds racing.

We are a charity and your support gives the palaces a future, for everyone.

Although the Palaces are owned by The Queen on behalf of the nation, we depend on the support of our visitors, members, donors, volunteers and sponsors.

Historic Royal Palaces is committed to taking appropriate steps to ensure that slavery and human trafficking is not present within our organisation or within its supply chains, and will not knowingly engage with a supplier or entity involved in slavery or human trafficking.

In accordance with the Modern Slavery Act 2015, Historic Royal Palaces has in place, and will continue to monitor and improve, processes to ensure transparency within the organisation and of those organisations which supply goods and services to Historic Royal Palaces.

Historic Royal Palaces takes the issue of modern slavery seriously. The majority of procurement activities are specialist in nature and, with few exceptions that include some Retail goods for re-sale, staff uniforms and IT equipment, do not involve traditionally high-risk activities nor production and sourcing outside of the United Kingdom.

Our internal policies detail Historic Royal Palaces' commitment to acting ethically and partnering with organisations that share that vision and can demonstrate compliance.

At the present time, Historic Royal Palaces is taking the following steps to minimise the risk of modern slavery being involved in any of its supply chains:

- all Procurement staff have undertaken and passed the CIPS Ethical Procurement and Supply course, which includes modules on human rights abuses;
- HRP now proudly bears the CIPS Corporate Ethics Mark which shows we as an organisation have taken proactive steps, to safeguard against unethical conduct in procurement and supply management;
- via our membership with the London Universities Purchasing Consortium are affiliated with Electronics Watch for IT purchases, who protect the rights of workers in electronics global supply chains;

- developed and launched a Supplier Manual (found here) which contains a chapter on policies and procedures with respect to modern slavery. This will be shared and communicated to all staff as part of informing them of Historic Royal Palaces' commitment to minimise its existence;
- reviewed safeguarding policies and within the contracts we place plan to include provisions to ensure that all concerns or incidents of safeguarding are recognised, reported and responded to;
- checks that staff can demonstrate their eligibility to work in the UK and that contractors and agency staff undergo an eligibility check prior to commencing work;
- suppliers identified as presenting a Modern Slavery risk will in future be asked to complete the Home Office Modern Slavery Act checklist;
- included a section within our counter-party risk register on Modern Slavery risk which is completed for key contracts and reviewed annually by the audit and risk committee;
- due diligence checks conducted on suppliers of goods and services for all major contracts and Retail Buying activity at the time of sourcing and those where the nature of the goods or services mean the risks are judged to be higher;
- factory visits and third party audits where the risks are judged to be higher;
- contractual clauses to ensure compliance of both our suppliers and sub-contractors to modern slavery legislation;
- all internal policies are supported by Historic Royal Palaces' whistleblowing policy, to encourage those who have concerns to raise them, and protect and support them when doing so;
- monitor trends in respect of complaints received / frequency of suppliers being found to be non-compliant with the Home Office Modern Slavery Checklist;
- Modern Slavery and trafficking awareness video training for all staff.

During the forthcoming year we will review and reinforce effective due diligence and controls to ensure slavery and human trafficking is not taking place in our supply chains in the form of improved supplier questionnaires and checklists and undertake more factory visits and audits.

This statement was approved by the Executive Board of Historic Royal Palaces on 29 September 2021.



**John Barnes**  
**Chief Executive Officer**  
**30 September 2021**