
Modern Slavery Act 2022/23 Annual Transparency Statement

This statement is produced under the university's obligation to publish an annual 'Modern Slavery Act Transparency Statement' in accordance with the provisions of Section 54 of the Modern Slavery Act 2015.

About us

King's College London was established in 1829 and is a purpose driven university, dedicated to finding solutions to urgent global challenges through teaching, research and collective impact. King's 'Strategic Vision 2029' describes the College's vision to make the world a better place. This strategic vision was launched in January 2017 and takes us to our 200th anniversary in 2029. It builds upon our history of making a full contribution to society, as we continue to focus on world-leading education, research, and service in an increasingly interconnected and complex world. As such, the university is committed to ensuring that mechanisms are in place to be an ethical employer and contractor of goods and services.

Employment

King's is an accredited Living Wage employer, paying all directly employed staff, and contractors working for extended periods on our premises, a wage that recognises the costs of living in London. The College increased the London Weighting Allowance for staff in 2022 then again in 2023 to recognise difficulties faced by the cost-of-living crisis and provides other financial support like loans to help staff get through difficult times and a range of discounts with companies as part of a wider staff benefits package. The College's pay increase mechanisms provide for greater percentage increases to staff whose pay is at the lower end of our scales. Likewise, the College's Preferred Supplier List of Recruitment Agencies for Temporary Staff requires that at least the Living Wage is paid to individuals that we engage.

Supply chain

The University has put in place controls to reduce the risks of modern slavery in our supply chain. All potential new suppliers are vetted before being awarded a contract to ensure they commit to conducting their business in compliance with the provisions of the Modern Slavery Act 2015 (or equivalent standards if not based in the UK) and other social and ethical standards contained in our terms and conditions of contract. The College has procured a Supplier Assurance Tool to allow it to identify, risk assess and monitor suppliers to ensure we meet our social, ethical, environmental and governance objectives. The College also has terms and conditions of contract which make it a requirement on those with whom we do business to adhere to a Supply Chain Code of Conduct and provide assurances that workers in their organisation, and in their further supply chain, are not subject to inhumane practices and that the welfare of staff is properly protected.

Procurement at King's

The College comprises ten Professional Services Directorates and nine Faculties, these total upwards of 327 Departments, and there are numerous research groups within each faculty. As the College operates on a system of devolved budgets, control over the day-to-day spending of these groups is delegated through line management in accordance with the university's Financial Regulations and Procedures and Purchasing Policy. The University takes a proportionate approach to procurement which allows for low value spend to be procured locally but requires that the Procurement Office is consulted for high value spend or where a grant funder requires a procedure to be followed which aligns with the legal requirements of the EU or domestic Regulations.

The College has implemented a Socially Responsible Procurement Policy to better ensure that social benefits are gained and risks of damage to society are reduced when procuring third party contracts. The policy is intended to ensure that King's purchases third party goods and services in ways which are beneficial to society and King's local boroughs. It promotes responsible environmental, social, and economic goals and meets the requirements of the Equalities Act 2010, the Modern Slavery Act 2015, and other legal obligations. Key milestones under this policy have included:

- The incorporation of social, economic and environmental sustainability criteria into its tender documentation and processes;
- The increased number of Social Enterprises in its supply chain and social value outcomes from its contracts;
- A supply chain consisting of mostly micro businesses and SMEs, and which are primarily located in the UK;
- the incorporation of a supply chain code of conduct into our evaluation procedures and contracts to ensure the welfare of staff engaged on our outsourced contracts;
- a supplier risk assessment tool which aims to minimise the potential that the University's supply chain is compromised ethically or against other business resilience factors
- and our partnership with Electronics Watch, a non-governmental body which works with buyers and civil society to monitor the practices in electronics factories across the work using worker-led surveys.

In academic year 2022-2023, the non-pay contractual expenditure (which is influenceable by the Procurement function) of the University on goods, works and services was approx. £315 million gross of VAT with around 4600 different suppliers. The nature of this expenditure falls predominantly within the following categories:

- Estates and Facilities - Capital Projects and minor works
- Premises Services - Catering, furnishing, heating, and cooling and other facilities management services.
- ICT Equipment and Services - Computing, Communications and Audio Visual
- Laboratory Supplies - Research and Scientific Consumables
- Research Services – Services related to drug trials, equipment, consultancy
- Library Provisions - Books, e-journals, and subscriptions
- Professional Resources – Consultancy, Recruitment and Legal Services
- Corporate Business Services - Travel and Accommodation

Assurance in relation to donors and research collaborators

A Compliance Assurance Review was undertaken internally in the 2020-21 year and concluded through sample testing that there are established processes whereby appropriate assurances are taken from potential collaborators with regards to their processes for recruiting staff and whether these comply with local employment laws (where a collaborator is based overseas) and the UK Modern Slavery Act. To support the collection and assessment of these assurances, the University uses suitable electronic tools, including a due diligence application for research and fundraising activities.

Both research and fundraising processes seek to assess third-party collaborators or entities to ensure that their business practices are legally compliant with the Modern Slavery legislation and that their standards of conduct align with the high expectations of the University and our funders. The Fundraising


Ethics Review Group is an important element to this work. Both processes include steps for review of due diligence outcomes and incorporate wider reporting obligations to appropriate University committees.

The University also supports various other approaches to ensuring compliance with Modern Slavery legislation in its arrangements for Research. For smaller partnership arrangements, King's generally insists on using the sector-standard Brunswick Collaboration Agreement templates, which contain a provision that "all parties shall ensure that in carrying out the project they will comply with all applicable laws, regulations, and statutes, including those relating to modern slavery and anti-bribery". On larger agreements, similar contractual clauses will be inserted by the Research Grants and Contracts Team as a mandatory requirement. In sub-contracting research work through collaborating partners, the University ensures that they maintain the standards of compliance expected by Modern Slavery legislation through an established due diligence process which is supported by the use of an electronic due diligence tool. A similar due diligence process is undertaken with respect to commercial research funders, and compliance is incorporated through contractual obligation.

The internal Compliance Assurance Review conducted in the year 2020-21 was also able to establish, through a series of sample tests, that the processes in Fundraising and Research Management were also robust and comprehensive.

The University is vigilant in all areas of activity that may be open to the risk of slavery, trafficking and human rights abuses generally taking place, but it enhances the questions asked in areas identified as high risk due to the nature of the industry, nature of the work or supply/business model such as:

- the selection and evaluation stages of procurements where risks are highest such as when purchasing personal protection products (including garments and gloves), electronics and medical or laboratory supplies and when putting construction contracts in place;
- the acceptance of high value donations to support its work;
- its work with Research Partners in the UK and globally.



Lord Geidt
Chair of King's College Council

18 January 2024

This statement was approved by Council on 18 January 2024