
Modern Slavery Act 2020/21 - Annual Transparency Statement for the financial year ended 31 July 2021

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.

King's College London has the stated corporate strategic vision 'to make the world a better place'. As such, the university is committed to ensuring that mechanisms are in place to ensure we are ethical employers and to prevent business being undertaken with an organisation that has not adopted appropriate steps to ensure that human rights abuses are not taking place in any of its supply chains. Accordingly, 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. Further, the College will not agree to any new supplier being added to its finance system unless they assure us via our 'new supplier vetting' that they conduct their business in compliance with the provisions of the Modern Slavery Act 2015 and other social legislation. The College also has terms and conditions of contract which make it a requirement on those with whom it does business to provide assurances that workers in their organisation and in their further supply chain are not subject to inhumane practices and that their welfare is properly protected.

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 it operates on a system of devolved budgets, control over the day-to-day spend 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 the Public Contracting 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 establishment of a Responsible Procurement Advisory Group comprising students and staff from professional services and academic faculties of the College;
- the incorporation of a supply chain code of conduct into our evaluation procedures and contracts;
- a supplier risk assessment tool; 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 2020-2021, the non-pay contractual expenditure (which is influenceable by the Procurement function) of the university on goods, works and services was approximately £177 million with around 3269 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
- Office Supplies - Stationery, Printing, Postage

A Compliance Assurance Review was undertaken internally in the 2020-21 year and concluded through sample testing that appropriate assurances are taken from potential vendors with regards to their supply chains and socially responsible business practices. To support with the collection and assessment of these assurances, the College uses suitable electronic tools, including a due diligence research tool.

A similar approach is taken to assessing major corporate donors 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 College regarding social responsibility. The process to assess donors includes a step for senior review of due diligence outcomes.

The College also supports various approaches to ensuring compliance to 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 procure goods and services in a way that complies with all applicable laws, regulations, and statutes, including those relating to modern slavery and anti-bribery. On larger agreements, a similar contractual clause will be inserted by the Research Grants and Contracts team as a mandatory requirement. In sub-contracting research work, the College ensures that its partners maintain the standards of compliance expected by UK Modern Slavery legislation through an established due diligence process and supported using an interrogatory electronic tool. A similar due diligence process is undertaken on commercial research partners, although compliance is also enforced with such partners through contractual obligation.

The internal Compliance Assurance Review conducted in the 2020-21 year 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 College 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:

- 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
- the acceptance of high value donations to support its work
- its work with Research Partners in the UK and globally

The College during the year has implemented supply chain mapping projects for student nursing uniforms and laboratory used gloves, the next stage being assessment of all suppliers and their approach to labour ethics.

Milestones for the next Reporting Year include:

1. Reviewing the Socially Responsible Procurement Policy;

2. Assessing the College against the ISO20400 Sustainable Procurement Guidance Standard;
3. Establishing Responsible Procurement Plans for each KCL Procurement Category; and
4. Establishing Responsible Procurement Key Performance Indicators for each full tendered contract.

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.



Lord Geidt
Chair of King's College Council

This statement was approved by Council on 20 January 2022