



## **ANTHONY NOLAN ANTI MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR 1ST APRIL 2019 TO 31ST MARCH 2020**

### **INTRODUCTION**

Anthony Nolan is a registered charity in England and Wales and Scotland that helps save the lives of people with blood cancer or blood disorders who need a blood stem cell or bone marrow transplant. We use our register to match remarkable individuals willing to donate their blood stem cells to people who desperately need lifesaving transplants.

This statement is designed to comply with the requirements of Section 54 of the Modern Slavery Act 2015 and outlines the steps that Anthony Nolan has taken to ensure that slavery and human trafficking are not present in our business operations or any part of our supply chain. Anthony Nolan has a zero-tolerance approach to slavery and human trafficking. We will not offer contracts to suppliers that do not take all reasonable steps to ensure that slavery and human trafficking are not present within their own activities and supply chain.

This statement has been approved by Anthony Nolan's Board of Trustees and Strategic Leadership Team and they recognise the importance of the Modern Slavery Act. The Finance and Resources Director takes the lead to ensure that processes to comply with the Act continue to be implemented across Anthony Nolan.

### **OUR BUSINESS OPERATIONS**

Anthony Nolan is committed to ensuring that its own operations are free from slavery and human trafficking.

We employ over 300 direct employees within the UK. We check that all of our employees have the right to work in the UK. As a Living Wage Foundation accredited employer, we are proud to pay the London Living Wage or UK Living Wage to all employees and contractors; this is a voluntary commitment above the National Living Wage set by the government, which is the minimum wage for over-25s.

We work with recruitment agencies and self-employed contractors to cover permanent and temporary assignments. We use only reputable employment agencies, which have been appraised in line with our supplier appraisal procedure, to source labour and we always verify the practices of any new agency we use before accepting workers from that agency.

## OUR SUPPLY CHAIN

The supply chain for Anthony Nolan can be divided into the following top-level categories:

- Human Tissue, goods and services for our Operations & Patient Services division (including recruitment of stem cell donors);
- Laboratory equipment, consumables and services;
- Fundraising materials and services;
- Communications and marketing goods and services;
- IT equipment and services;
- Travel and accommodation;
- Facilities, utilities and property related goods and services;
- Recruitment agencies;
- All other professional services.

As the supply chain is large and complex we are unable to guarantee that the whole supply chain is completely free from forms of modern slavery and human trafficking. However, we take steps, based on our supplier appraisal process and ongoing collaboration with those suppliers, to ensure that our suppliers are free of all aspects of modern slavery or human trafficking occurring in their direct operations. These steps include inserting a clause, drafted for Anthony Nolan by external lawyers, or accepting suppliers' own clauses where adequate, into new supplier contracts to ensure that they satisfy the requirements of the Modern Slavery Act 2015. We also communicate our anti-slavery and human trafficking policies to our staff and supply chain.

## SUPPLIER APPRAISAL

To ensure that Anthony Nolan's suppliers comply with the Modern Slavery Act 2015, suppliers are appraised by our Procurement Team. We include a Modern Slavery compliance section in our appraisal process alongside sections on corporate social responsibility, ethical policies, and Real Living Wage compliance for any personnel who are contracted to work on any of our sites.

Our contracts management process includes a review stage to ensure that current suppliers maintain all standards and procedures disclosed by them during the supplier appraisal. Suppliers are required to provide statements, and any professional accreditations available, to satisfy compliance with the Modern Slavery Act.

Our Procurement staff complete the Chartered Institute of Procurement and Supply (CIPS) Ethical Procurement and Supply qualification annually, keeping them up to date with the best practices for identifying and acting on slavery and human trafficking within the supply chain.

## ACTIONS TAKEN THIS YEAR

In our 2018-2019 statement, we set out three aims for the 2019-2020 financial year:

- Produce the next risk report and mitigation plan, updating and maintaining the supplier risk register as appropriate;
- Strengthen and improve the effectiveness of our relevant policies and procedures at reducing the risk of modern slavery and human trafficking occurring in our supply chain; and
- Implement a modern slavery awareness training programme for key staff.

The 2020 Risk Report and Mitigation Plan confirmed that our risk of exposure to human trafficking and modern slavery in our supply chains remains low ; the updated supplier risk register shows that our risk level decreased during the last year, which suggests our mitigation plan is working. We will continue to monitor our risk level and adapt the mitigation plan as necessary.

In our review of the effectiveness of our policies and procedures we identified several ways we could strengthen and improve that effectiveness, including better communication of the policies and procedures and ensuring high risk suppliers are re-appraised every 6 months.

The 2018 risk register identified only one supplier that represented both a high risk sector and a high risk location; the supplier was flagged for re-appraisal but in the event, no re-appraisal was required as they no longer supply services to Anthony Nolan.

In June 2019 we launched a procurement training session, open to all staff, which covered our supplier appraisal process in detail and emphasised the importance of ethical sourcing, including awareness of modern slavery and the correct procedure to assess new suppliers. This training has been continually delivered to staff who regularly manage onboarding of new suppliers. This has led to better compliance with regard to the risk management of new suppliers.

To build on this training, and as part of our aims for this financial year, we identified a suitable modern slavery awareness training programme in early 2020 and were planning to launch it in early April 2020. Unfortunately, due to the COVID-19 pandemic and the associated absence of key staff needed to implement the learning programme, we were unable to roll out the training. The programme will instead be launched as soon as practically possible.

In June 2019 we became an affiliate member of Transparency In Supply Chains (TISC), verifying our Modern Slavery Act statements published with them and adding their logo to our website's homepage.

## **WORK FOR THE FUTURE TARGETS FOR 2020**

By the end of the 2020-2021 financial year, we aim to:

- Implement the modern slavery awareness training programme we have chosen for key staff;
- Establish a Code of Conduct suppliers will be required to sign, including ethical procurement practices and anti-slavery measures;
- Launch regular communications to all staff reminding them to familiarise themselves with our ethical and anti-slavery policies; and
- Increase visibility of our risk of exposure to modern slavery by understanding the next level of the supplier chain , by requiring all new and re-appraised suppliers to inform us of their appraisal processes for their direct suppliers.

## **LONG TERM AIMS**

Ultimately, we aim to:

- Produce a biennial risk report and mitigation plan covering our active suppliers;
- Continually review and update as necessary our policies in relation to anti-modern slavery and human trafficking;
- Continually review and improve sign-off processes for potentially high-risk and high-value suppliers.

We will provide regular updates to the Audit & Finance Committee and the Board of Trustees on our annual policy review, as well as progress against our aims, with a view to including future plans in the charity's business strategy.

This statement will be reviewed in 2021 and published in line with the requirements of the Modern Slavery Act 2015.

*Ian Krieger*

**Ian Krieger**, Chairman  
Date: 24 July 2020

*Henny Braund*

**Henny Braund**, Chief Executive  
Date: 18 August 2020