



saving the lives  
of people with  
blood cancer

## **ANTHONY NOLAN ANTI MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR 1ST APRIL 2020 TO 31ST MARCH 2021**

### **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 who recognise the importance of the Modern Slavery Act. The Chief Financial Officer takes the lead to ensure that processes to comply with the Modern Slavery 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 only use 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 and our Cell & Gene Therapies 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; and
- 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. This statement is also available on our Charity website.

## 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, as well as completing Vendor Risk Management assessments through OneTrust (our privacy management software) to help us evaluate and risk assess new suppliers.

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 issues within the supply chain.

## ACTIONS TAKEN THIS YEAR

During the 2020-2021 financial year we developed and launched a modern slavery awareness training programme for key staff, aimed at educating staff on the risk factors and warning signs of modern slavery. Staff are asked to take a short quiz on completion of the training to consolidate the learning.

We also began work on a Code of Conduct which suppliers will be asked to sign, requiring them to commit to ethical procurement practices and anti-slavery measures.

## PLANS AND TARGETS FOR THE NEXT FINANCIAL YEAR

By the end of the 2021-2022 financial year, we aim to:

- Produce an updated risk report and mitigation plan;
- Launch our Code of Conduct for suppliers;
- Launch quarterly digital communications to all staff reminding them to familiarise themselves with our ethical and anti-slavery policies; and
- Establish and monitor the following Key Performance Indicators;
  - Average score on Modern Slavery Awareness training quiz to exceed 80%
  - Percentage of new suppliers signing up to our ethical Code of Conduct
  - Percentage of new suppliers disclosing information about their appraisal processes
  - Percentage of new suppliers submitting Vendor Risk Management assessments through OneTrust
  - Percentage of new suppliers confirming their organisations are slavery and human trafficking free.

## LONG-TERM AIMS

Ultimately, we aim to:

- Produce a biennial risk report and mitigation plan covering our active suppliers (next report due 2022);
- Continually review and update as necessary our policies in relation to anti-modern slavery and human trafficking; and
- 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 2022 and published in line with the requirements of the Modern Slavery Act 2015.

Ian K

**Ian Krieger**, Chairman

Date: 22/7/21

Henny Braund

**Henny Braund MBE**, Chief Executive

Date: 22/7/21