



ENGLISH HERITAGE

# Modern Slavery Transparency Statement

For 2022/23



## **Modern Slavery Transparency Statement 2022/23**

### **I. About English Heritage**

English Heritage cares for over 400 historic buildings, monuments and sites – from world-famous prehistoric sites to grand medieval castles, from Roman forts on the edges of the empire to a Cold War bunker. Through these, we bring the story of England to life for over 10 million people each year.

We protect an internationally-important collection of historic sites and artefacts which span six millennia, from the ancient past to the present day and include palaces, houses, hill figures, castles, abbeys, industrial sites, Roman forts and even deserted medieval villages.

Caring for these places and their collections for the benefit of this and future generations is a cornerstone of everything we do. The generous support of many donors enables us to do this. We have now embarked on the largest conservation programme in our history. Highly skilled conservation work will be carried out on an unprecedented scale, and we will allow the public to witness this as it progresses.

Gone are the days when people learned about history simply from reading books. People are increasingly looking for experiences that bring history to life in an engaging way and nothing beats standing on the spot where history happened.

We offer a hands-on experience that will inspire and entertain people of all ages. Our work is informed by enduring values of authenticity, quality, imagination, responsibility and fun. We want people to experience the story of England where it really happened.

The skill, knowledge, enthusiasm, and commitment of our staff and volunteers make English Heritage a special place to work.

As a registered charity, we are governed by a Board of Trustees who delegate day-to-day responsibility for the running of the organisation to a Senior Management Team. The range of roles and expertise we cover is immense and draws people from a wide range of sectors and backgrounds.

With our new freedom as a charity, independent of government, our ability to engage with millions of people is now greatly strengthened. We have identified four major priorities going forwards – 1. Inspiration, 2. Conservation, stewardship & sustainability, 3. Involvement & inclusion; and 4. Financial sustainability.

We want to create inspiring visitor experiences that bring the story of England to life. We will also make sure our historic sites and artefacts are expertly cared for, so that they can be enjoyed by future generations. We will find new ways to involve more people in our work and our target is to ensure we are financially sustainable.



## **2. Context to this Transparency Statement**

This statement addresses the requirements of Section 54 of the Modern Slavery Act 2015 and subsequent amendments. Its purpose is to inform our stakeholders, employees, suppliers, members, customers and any interested parties of our stance, risks and practices in relation to modern slavery, human trafficking, forced and bonded labour and labour rights violations (hereafter collectively referred to as 'Modern Slavery') along with the steps we take to identify, report and mitigate the risks.

## **3. The Modern Slavery and Human Trafficking Transparency Statement**

This statement is published on 1 April 2023 pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes English Heritage's Modern Slavery and Human Trafficking Transparency Statement for the financial year ending 31 March 2023. This statement has been approved by the Board of Trustees and is communicated to our people and suppliers.

We support the United Kingdom Government's National Action Plan in the implementation of the United Nations Guiding Principles on Business and Human Rights.

At English Heritage we have a zero-tolerance policy towards any form of Modern Slavery and coerced labour or human trafficking, both in our own organisation and within our supply chain. We have identified potential risks of Modern Slavery in two distinct areas – our workforce and our supply chain – these are addressed in more detail within this statement.

In October 2022, as a counterpart to this external Modern Slavery Transparency Statement, an internal Modern Slavery Policy was introduced. This Policy provides a clear and consolidated view of English Heritage's stance on Modern Slavery, details all the controls we have in place, and codifies everyone's role in our Modern Slavery Act compliance activity. Our Modern Slavery Policy is reviewed no less than annually and is, as applicable, amended in line with latest best practice.

### **Our workforce**

Our recruitment and human resources policies and processes comply with legislation and embrace best practice, including checks on the right of employees, agency workers, contractors and volunteers to work within the UK. We believe that these policies and processes would identify trafficked or coerced individuals directly employed or engaged by us.

Our employment, volunteering and [whistleblowing procedures](#) allow any individual (anonymously, if preferred) to report any welfare or working practice concerns about anyone in the English Heritage workforce. Our safeguarding procedures also support our site-based employees and volunteers, as well as our education and youth participation teams in identifying and reporting potential signs of abuse, neglect or child exploitation in any of our stakeholder groups.



Our workforce is supported, nationally, by the Human Resources and Volunteering team, who readily give advice on any of the above. In addition, all our people have access to confidential support and counselling via our employee and volunteer assistance programme, should they wish to seek confidential advice or have any concerns about Modern Slavery and/or human trafficking affecting them, their families or their friends.

## **Our supply chain**

We wholeheartedly support sustainable and ethical procurement and, as an organisation in receipt of public money, we abide by the Public Contracts Regulations 2015 and its principles of value for money and transparency. Where possible, we procure through Crown Commercial Service framework agreements. We have more than 3,500 suppliers that support our work.

The Organisation for Security and Co-operation in Europe has identified six industries/supply chains where Modern Slavery is a particular risk – Cleaning, Hospitality, Construction services, Construction materials, ICT Hardware and Food industries. In addition, the UK Government's Gangmasters & Labour Abuse Authority also classifies Textiles as another higher risk industry/supply chain for Modern Slavery.

We recognise that a significant proportion of our procurement (around £39m per annum), is in these seven higher risk areas where Modern Slavery and human trafficking can be more common. As such, all suppliers supporting our work in these areas have contracts in place which specify English Heritage's ethical and environmentally sustainable manufacturing and sourcing standards that the supplier is required to meet.

Furthermore, particularly due to our spend in these higher risk industries, rigorous measures are in place which formalise and standardise our approach to Modern Slavery due diligence – consequently English Heritage has best practice controls throughout the procurement cycle.

This includes at supplier section stage, where our Procurement Policy incorporates proactive Modern Slavery evaluation in all tenders as part of a balanced scorecard. It then becomes a key aspect of the legal agreement between us and our suppliers, as English Heritage's Supplier Charter sets out moral and compliance expectations, and forms part of the contract between parties.

Once suppliers are working with us, our Vendor Management Framework standardises and enhances contract management practices across the organisation, thus ensuring Modern Slavery continues to be focused on throughout the trading relationship. Management of the risk of Modern Slavery in this way forms part of the spectrum of English Heritage's ongoing supply chain assurance, along with Environmental Sustainability, Equality Diversity & Inclusion, Health & Safety and Information Security.

In addition, and for suppliers in these higher risk areas, we have a risk-based and rotational programme of detailed audits and site visits in place.



## **Our communication of stance and practices**

We have communicated this approach, as well as our internal Modern Slavery Policy, to all our workforce via normal internal communications avenues, and our people have been reminded of the routes that they may use to report any concerns.

## **Our goals for 2023/24**

English Heritage will continue to enhance its proactive programme of Modern Slavery risk assurance through three key mechanisms:

- Risk Assessment – the detailed risk assessment undertaken in 2022/23, which was conducted across the known areas of risk in our supply chain, will be performed again this year and the outcome will be up-to-date concentration on suppliers carrying tangible risk.
- Supplier Audits – our intention this year is to appoint a long-standing third-party specialist provider of audit services, to act as an expert partner to deliver a multi-year programme of supplier audits and associated improvement activity.
- Modern Slavery Policy annual update – our Policy will undergo a routine review this year to align with latest best practice, with any changes communicated to all our workforce.

Furthermore, English Heritage will deliver additional training and development in the below ways:

- Focused internal communications along with online training available for all employees on the legislation and our approach to Modern Slavery.
- All permanent members of our Procurement team will maintain the Chartered Institute of Procurement & Supply's Ethical Procurement & Supply Certificate, by completing annual assessments.

**Approved by the Board of Trustees on 1 April 2023 and signed on its behalf by:**

**Gerard Lemos**  
**Chair**  
**English Heritage**