

The Pirbright Institute Modern Slavery & Human Trafficking Statement for 2024-2025

1. CONTEXT

This Modern Slavery and Human Trafficking Statement relates to actions and activities for the financial year 2024-2025.

The statement sets down The Pirbright Institute's commitment to preventing slavery and human trafficking in any of our activities. Furthermore, it describes the steps we have put in place to ensure that there is no modern slavery or human trafficking in our own organisation or supply chains. We all have a duty to be alert to risks, however small. Staff, Students and Trustee Directors are expected to report their concerns and management are expected to act upon them.

Modern Slavery encompasses human trafficking, slavery, servitude and forced or compulsory labour as defined by The Slavery and Human Trafficking (Definition of Victim) Regulations 2022.

2. POLICY STATEMENT

Our Organisation

We are a world leading centre of excellence in research and surveillance of virus diseases of farm animals and viruses that spread from animals to humans. We receive strategic funding from UKRI - Biotechnology and Biological Sciences Research Council (BBSRC), and work to enhance capability to contain, control and eliminate these economically and medically important diseases through highly innovative fundamental and applied bioscience.

The Institute employs some 450 staff and research students and hosts visiting scientists, on its campus in Pirbright, Surrey, where investment by BBSRC has resulted in a redevelopment of the site and the construction of a high-level containment facility – the BBSRC National Virology Centre: The Plowright Building and a SAPO level two facility, The Jenner Building.

The Pirbright Institute is committed to compliance with, and to the principles of, the Modern Slavery Act 2015, and the abolition of modern slavery and human trafficking. We also commit to maintaining a Conflict-of-Interest Policy and Whistleblowing Policy as part of a wider suite of policies in this area, all of which are easily accessible by all the Institute's staff and students; these policies are regularly reviewed by the Trustee Directors.

Our People

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees and students from any abuse or coercion. We have robust processes to obtain assurance on:

- Right to work – Nationality and Immigration Status (including an entitlement to undertake the work in question)
- Identity – ID Data check (electronic identity authentication - name, address, aliases, links, accounts, etc.)

- Criminal Records – Search for unspent convictions only (Basic Disclosure)
- Employment history check – Confirmation of past 5 years employment (minimum) history / activity.

Furthermore, Pirbright has a rigorous suite of employment policies and provides a confidential Employee Assistance helpline, all of which are designed to support and safeguard our employees.

Training our people

To ensure good understanding of the risks of modern slavery and human trafficking in our Institute and its supply chains, the Institute implemented e-learning training for all staff, students, and Trustee Directors during 2023 with this training now mandatory for all new staff, students and Trustee Directors.

Our Procurement

Pirbright procurement for goods and services is provided by a wide range of suppliers. We are committed to ensuring transparency within our supply chain to ensure that our suppliers share our commitment to tackle modern slavery and human trafficking in a way which is consistent with disclosure obligations under the Modern Slavery Act 2015. We endorse the implementation and promotion of ethical business practices to protect our employees, students and Trustee Directors from abuse and exploitation and expect the same high standards from all our contractors, suppliers, and other partners.

The Pirbright Institute Procurement terms and conditions include a clause stating that the supplier must comply with the Modern Slavery Act 2015, and this is replicated in our Procurement procedures and policy, Tender documents, Request for quotes and Contract documents.

Due Diligence

The Pirbright Institute is committed to ensuring that any third parties we engage with adhere to the highest standard of ethics. During 2023 Pirbright developed a plan to support this statement. This is detailed below together with the progress made against each action. Pirbright has now built on this to develop an action plan for the financial year 2024-2025 and will provide a progress update on this plan in its Modern Slavery & Human Trafficking Statement for 2025-2026.

3. THE PIRBRIGHT INSTITUTE MODERN SLAVERY & HUMAN TRAFFICKING PLAN 2023 - UPDATE

During 2023 The Pirbright Institute planned to undertake the following activities, progress on which is also reported below:

- 3.1 Ensure that Modern Slavery and Human trafficking e-Learning training is sourced and then completed by all employees during 2023. The training will be a mandatory course for all staff. **Update:** e-Learning course sourced and 91% of all staff and students have successfully completed the training.
- 3.2 Establish an anonymous channel by which any concerns of Modern Slavery & Human Trafficking that any members of staff or student become aware can be reported and acted upon in a timely manner. **Update:** “Report a Concern” – an anonymous channel has been established on the Institute’s intranet, accessible to all staff and students.

- 3.3 Respond to guidance and changes in legislation on Modern Slavery and Human Trafficking as they arise. **Update:** Review undertaken and incorporated into the action plan for 2024-2025.
- 3.4 Contribute to the UK Government Modern Slavery Registry by adding The Pirbright Institute's Modern Slavery & Human Trafficking Statement for 2023. **Update:** Statement added to the UK Government Modern Slavery Registry in April 2023.
- 3.5 Ensure that template contracts produced by Pirbright include language to oblige compliance with modern slavery legislation (e.g.: The Parties shall and shall procure that persons associated with them who are working on the Project, comply with all applicable laws, statutes, regulations, and sanctions, including those relating to modern slavery and anti-bribery and anti- corruption (including but not limited to the Modern Slavery Act 2015 and the Bribery Act 2010).) The contract types to which this will be added include Collaboration agreements, Studentship Agreements, Subcontracts or Service Provision agreements, Consultancy agreements, Framework Agreements, Licence Agreements, Visitors Agreements and Funding Agreements where we provide funding to others. **Update:** Collaboration agreements with industry partners have been updated to include expectation of compliance with modern slavery legislation; wording to be rolled out to other types of agreement during 2024-2025.
- 3.6 Check terms and conditions for the provision of products, reagents, services, and training to include a clause noting that we can refuse to provide those services to organisations or individuals that the Institute discovers are not compliant with the legislation or equivalent applicable legislation where the agreement is not governed by UK law. The Pirbright Institute also reserves the right to immediately terminate any contract should it be found that the provider of products, reagents, services, and training is not compliant with the legislation. **Update:** Wording established for the Collaboration agreements as detailed above and will be rolled out into these agreements during 2024-2025.
- 3.7 Conduct an analysis of our top fifty direct suppliers. Many of our suppliers are on Framework Agreements and have comprehensive policies related to modern slavery. As a first step towards gaining a better understanding of our suppliers, we will introduce new targeted spot checks across our supplier database, performing credit checks, checking delivery against contract and physical location checks to identify suppliers who are vulnerable and most at risk of employing forced labour or slavery. We will continue to conduct spot checks and onboard new suppliers to our exacting standards and will introduce metrics to measure our performance in this area. **Update:** A process has been established to undertake this analysis with forty-two suppliers successfully completed in the year with ongoing communication underway with the remaining eight suppliers.
- 3.8 Communicate our stance on this issue to suppliers and contractors at the outset of our business relationship with them. Our new supplier form will be updated to include a question as to whether the supplier has a Modern Slavery and Human Trafficking statement and policy. Where it is considered appropriate and necessary, contracts will include an obligation for suppliers to share this with employees involved in delivering the contract and provide proof. **Update:** New supplier forms has been updated and contracts now include an obligation to provide proof that the supplier has a Modern Slavery and Human Trafficking statement and policy.

4. THE PIRBRIGHT INSTITUTE MODERN SLAVERY & HUMAN TRAFFICKING PLAN 2024-2025

During 2024-2025 The Pirbright Institute will undertake the following activities, progress on which will to reported on in future years' Modern Slavery and Trafficking Statements:

- 4.1 Ensure that Modern Slavery and Human trafficking e-Learning training is completed by all new employees, students, and Trustee Directors during 2024-2025 and the remaining 11% of existing staff, students and Trustee Directors who did not complete the training in 2023.
- 4.2 Ensure all concerns of Modern Slavery & Human Trafficking raised through anonymous channel by

any member of staff or student are acted upon in a timely manner.

- 4.3 Respond to guidance and changes in legislation on Modern Slavery and Human Trafficking.
- 4.4 Contribute to the UK Government Modern Slavery Registry by adding The Pirbright Institute's Modern Slavery & Human Trafficking Statement for 2024-2025.
- 4.5 Ensure that template contracts produced by Pirbright include the language already adopted for collaboration agreements with industry partners to oblige compliance with modern slavery legislation (e.g.: The Parties shall, and shall procure that persons associated with them who are working on the Project, comply with all applicable laws, statutes, regulations and sanctions, including those relating to modern slavery and anti-bribery and anti-corruption (including but not limited to the Modern Slavery Act 2015 and the Bribery Act 2010).) The contract types to which this will be added include: Studentship Agreements, Subcontracts or Service Provision agreements, Consultancy agreements, Framework Agreements, Licence Agreements, Visitors Agreements and Funding Agreements where we provide funding to others.
- 4.6 Terms and conditions for the provision of products, reagents, services, and training to include the clause already adopted for collaboration agreements with industry partners, noting that Pirbright can refuse to provide those services to organisations or individuals that the Institute discovers are not compliant with the legislation or equivalent applicable legislation where the agreement is not governed by UK law. The Pirbright Institute also reserves the right to immediately terminate any contract should it be found that the provider of products, reagents, services, and training is not compliant with the legislation. Furthermore, wording to this effect will be included on the relevant pages of the Institute's outward facing website.
- 4.7 Conduct an analysis of our top one hundred direct suppliers (forty-two completed in 2023) and all new suppliers. Using the process established during 2023 we will continue targeted spot checks across our supplier database, performing credit checks, checking delivery against contract and physical location checks to identify suppliers who are vulnerable and most at risk of employing forced labour or slavery. We will introduce metrics to measure our performance in this area.

5. EQUALITY & DIVERSITY

- 5.1 Promotion of equality & diversity is a part of corporate social responsibility. Development and implementation of this Policy actively seeks to avoid unjustified discrimination on equality grounds, including age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion, or belief, sex, and sexual orientation. During preparation of this Policy, no matters related to equality & diversity were apparent.

Approved by:

Signature



Name

Professor Bryan Charleston FRS

Position

Director & CEO

April 2024