

#### Modern Slavery Statement

This statement has been prepared by The Royal Parks and is made pursuant to section 54(1) of the Modern Slavery Act 2015 on the prevention of slavery and human trafficking for the financial year ending 31 March 2024.

### About The Royal Parks

The Royal Parks was incorporated in February 2016 with company number 10016100 and became a registered charity (Number 1172042) in March 2017. Officially launched in July 2017, we support and manage 5,000 acres of parkland across London. This includes eight Royal Parks: Bushy Park, The Green Park, Greenwich Park, Hyde Park, Kensington Gardens, The Regent's Park & Primrose Hill, Richmond Park and St James's Park. The charity also manages other important green spaces in London, including Victoria Tower Gardens and Brompton Cemetery. Welcoming more than 77 million visitors each year, we provide employment opportunities directly and through our suppliers to people with a wide range of nationalities.

#### Stance on Modern Slavery

TRP has a zero tolerance for modern slavery in all aspects of how we do business. This has been endorsed by the Board of Trustees, and the Executive Committee.

We are fully committed to playing an active part in tackling the risks and incidence of modern slavery and human trafficking within our organisation and supply chain. To our knowledge there have not been any reports of any instances of modern slavery in 2023/24.

The majority of our procurement is undertaken through formal processes and our trading activities, during the period under review, did not generally entail production and sourcing outside the UK or EU. Many of our procurements are carried out using government framework contracts where suppliers have been reviewed by Crown Commercial Services.

Our Modern Slavery Policy, and the other policies we have in place, reflect our commitment to:

- paying people fairly and properly for their work and never charging recruitment fees;
- ensuring full transparency in our own business and in our approach to tackling modern slavery throughout our supply chains;
- acting ethically and with integrity in all our business relationships; and
- enforcing effective systems and controls to ensure slavery and human

trafficking is not taking place anywhere in our business or supply chains.

## Our Workforce

The Royal Parks employs around 320 people on a year round basis as well as around 70 seasonal workers in our boating and swimming operation. Supporting our park operations involves many more contracted-out staff, who are employed by our partners, all of whom are based in the UK. We also benefit from the help given by willing volunteers in several of our parks. In July 2023, we opened a Retail shop in Hyde Park, with plans for future expansion to other parks. We also completed the insourcing of our landscape maintenance activities in Richmond Park in October 2023.

The Royal Parks recognises two trade unions for the purposes of consultation and negotiation in matters of staff terms and conditions of employment, and also has employee representatives. Most of The Royal Parks directly employed workforce is employed on a permanent or fixed term basis. Our recruitment takes place through a combination of direct advertising on our website, through digital sites such as LinkedIn as well as in industry publications/digital media and using reputable agencies.

Our recruitment and human resources policies and processes complied with legislation and embrace best practice, including checks on the right of employees to work in the UK, and Disclosure and Barring Services checks on all those, including contractors and agency staff, requiring a security pass. We believe that these policies and processes would identify trafficked or coerced individuals directly employed or engaged by us.

We have also continued to work towards our goal of ensuring that all of our qualifying staff and qualifying staff of our contractors and their sub-contractors are paid the London Living Wage in accordance with the Living Wage Foundation recommendations.

## Suppliers

The Royal Parks contractors and concessionaires employ a large number of staff, many of whom are from overseas and some of whom are employed on an ad hoc or casual basis. Some contractors also use sub-contractors. Contractors and concessionaires provide services including:

- Construction / buildings maintenance;
- Concessions e.g. catering, sports, deckchairs, cycle hire;
- Large events concerts, funfairs, art fairs, food festivals;
- Small events sports and other small events handled locally by individual parks;
- Landscape maintenance;
- Horticulture;
- Cleaning and lavatory attendants; and

• Gate locking and unlocking.

# Steps taken in 2023/24 to deal with Modern Slavery risk

We continued to take the following steps to minimise the risk of modern slavery being part of any of our supply chains:

- Appropriate due diligence checks on suppliers of goods and services for all major contracts as they were re-tendered, including the requirement for references and a focus on quality as well as price;
- Formal annual checks that key current suppliers and contractors have issued modern slavery statements (where they are required to do so).
- The use of an internal process for the escalation of suspected Modern Slavery cases or breaches.
- Encouraging those who have concerns to raise them including through the use of The Royal Parks whistleblowing policy which offers protection and support to those who use it in good faith.
- We also developed Purchase Order Terms & Conditions, which will be automatically issued to our suppliers through our new finance system.

## Next steps

In June 2024 we have launched a new Learning Management System (LMS), accessible to all TRP employees. The LMS includes new mandatory training modules on the topic of Modern Slavery that new and existing employees must complete on a timely basis. It also ensures they review the latest policy on modern slavery.

We have also created a Modern Slavery Action Group, composed of members from relevant departments with appropriate authority to discuss Modern Slavery risks across TRP. The Modern Slavery Action Group also receives the support of three ExCom members. The Modern Slavery Action Group will continue to meet throughout the year to continue to improve TRP's approach to Modern Slavery.

We intend to take the following steps to minimise the risk of modern slavery in any of our supply chains:

- Continue to use contractual clauses to ensure compliance of both our suppliers and their sub-contractors with modern slavery legislation when major contracts are re-tendered or extended;
- Continue to carry out formal annual checks that key current suppliers have published modern slavery statements (where they are required to do so);
- In the future, where we perceive the risk to be high in terms of Modern Slavery, we will include within the contractual terms and conditions appropriate / adequate audit rights. This will ensure that The Royal Parks has the required transparency to ensure Modern Slavery compliance. This could include external inspections, external audits, and unannounced external spot-checks;

- Review our internal reporting mechanisms to allow staff to raise any concerns regarding Modern Slavery.
- Launched a new financial system in April 2024. The system will facilitate the implementation of the new Purchase Order Terms & Conditions previously developed and ensure that the commencement of supply of good and services includes the relevant provisions in relation to Modern Slavery
- Evaluate the opportunity to subscribe to compliance tools to help us evaluate risk in our supply chain and map out our Supply Chain; and
- Addition of express contractual requirements in relation to the prevention of modern slavery to new tenders and contracts for goods and services and for works and concessions. These contractual requirements must meet internally agreed thresholds.

#### The Statement needs to be signed by the Chair

The Royal Parks Date: 29<sup>th</sup> October 2024

Loyd Grossman CBE FSA Chairman