



Modern slavery statement 2021/22

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes Cancer Research UK's ("CRUK's") slavery and human trafficking statement for the financial year ending 31 March 2022. Of our wholly owned subsidiaries, this statement covers the activities of Cancer Research UK Trading Limited and Cancer Research Technology Limited.



Introduction



At Cancer Research UK, our vision is to bring about a world where everybody lives longer, better lives, free from the fear of cancer.

We recognise our responsibility to all our staff, volunteers, researchers, supporters, suppliers and partners to ensure everyone within our charity is treated fairly, and that we operate ethically and responsibly. We remain committed to identifying, preventing and mitigating human rights issues in our operations and supply chains. We recognise modern slavery, particularly forced labour, as a key area of risk in our supply chains, both local and global.

Our approach to addressing the risk of modern slavery was internally audited in 2019/20 and from this, several recommendations and actions were agreed and worked on across the charity. However, due to the organisational impacts of COVID-19, we are still to meet some of our ambitions.

This year, we launched our new strategy 'Making discoveries. Driving progress. Bringing hope', which sets out our vision for the future and

how we will achieve it. One of our five strategic objectives is 'Sustain'. This is about us becoming a truly sustainable organisation, protecting people and planet while achieving our mission. Included in this is our commitment to identifying, preventing and mitigating the risks of modern slavery.

In 2022/23, our immediate priority will be to review our approach to addressing the risk of modern slavery, and then delivering the changes we need to make as a result. We will also review the resources we commit to sustainability, whilst continuing to develop and refine our sustainability strategy and the governance structure and process around it. This will ensure the foundations are in place to continue working towards best practice in the years ahead.

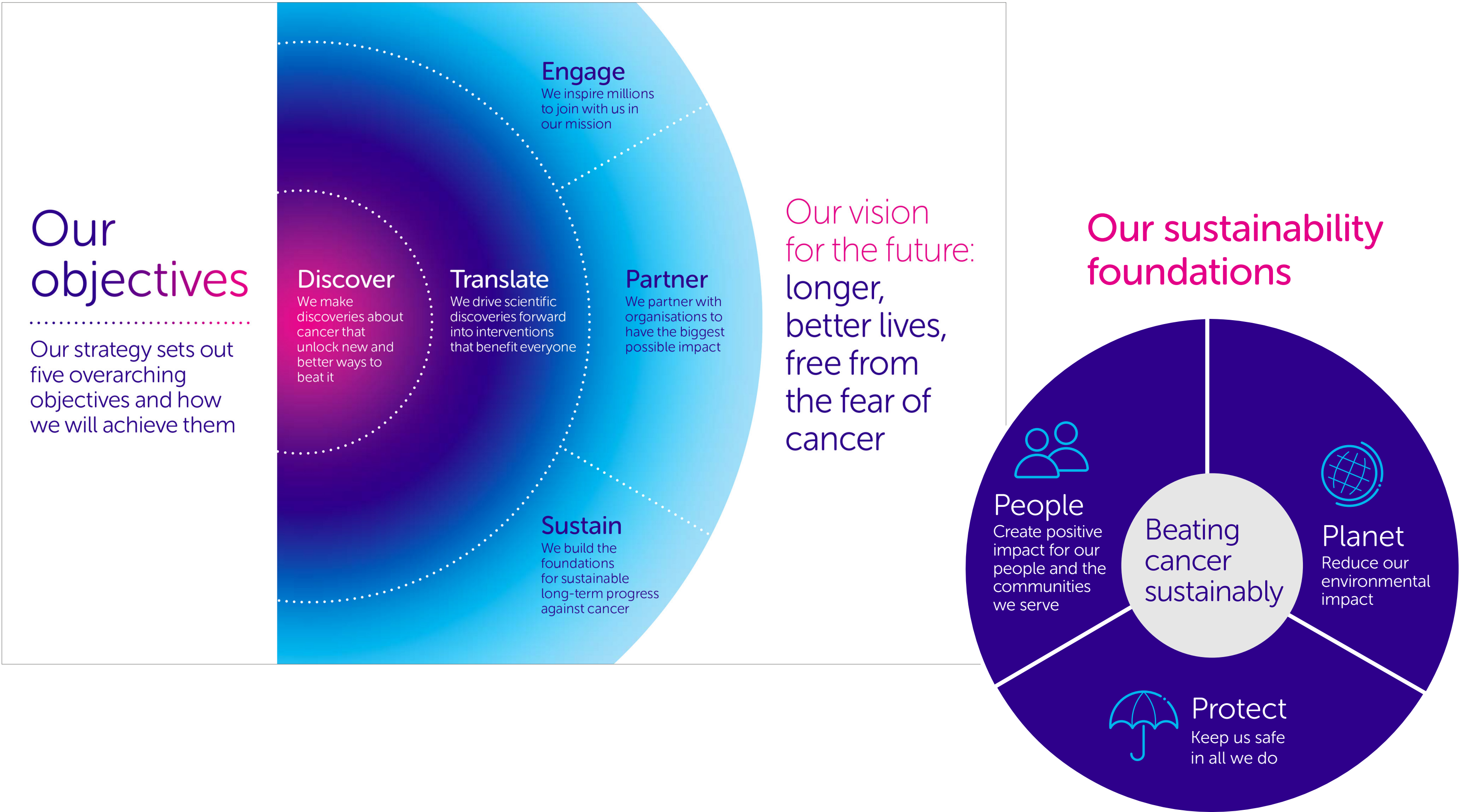
A handwritten signature in black ink, reading "M. Mitchell".

Michelle Mitchell OBE
Chief Executive

Our approach to being a sustainable organisation

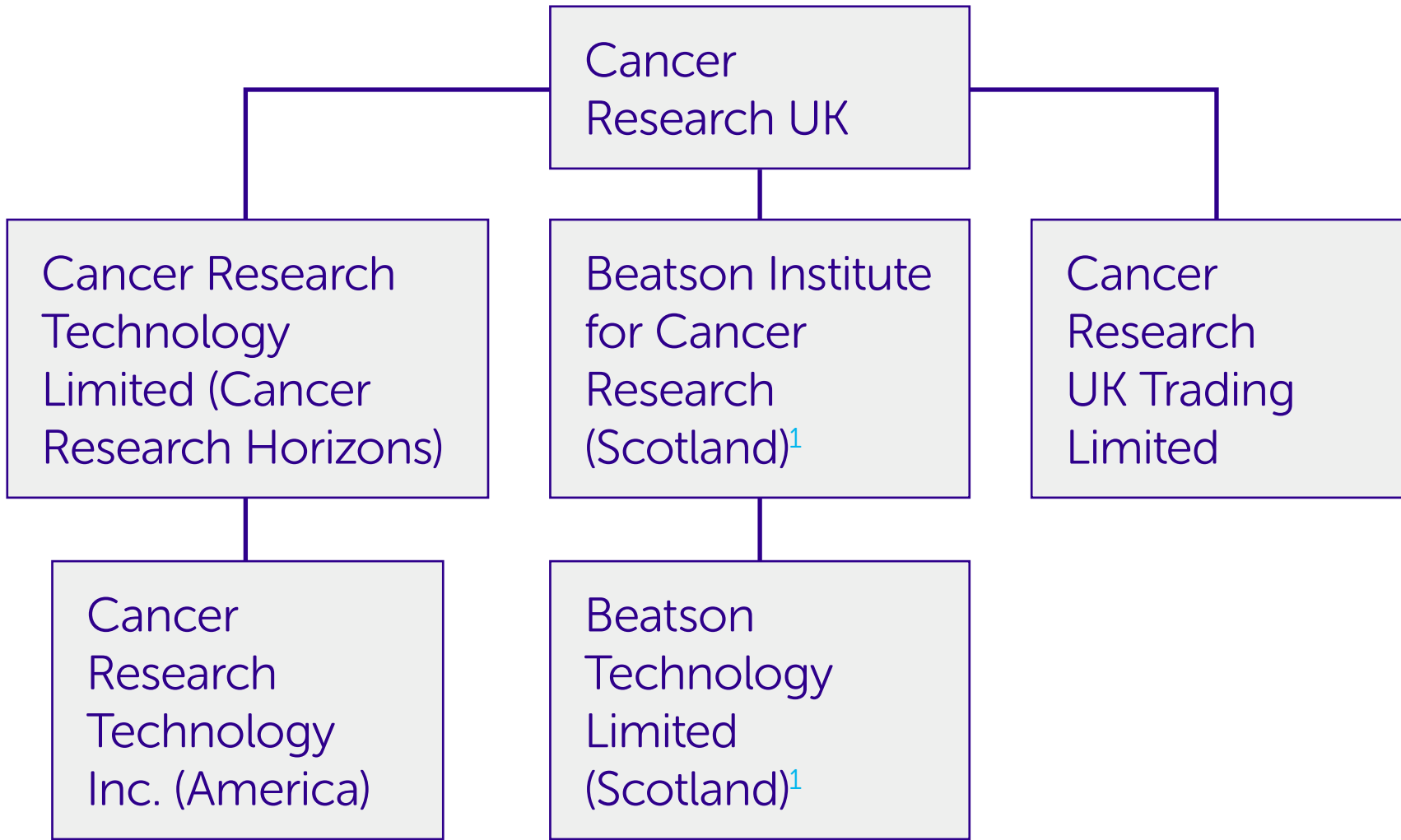
Our new strategy sets out how we will achieve our vision of bringing about a world where everybody lives longer, better lives, free from the fear of cancer.

Within our Sustain objective, we have three pillars that underpin our work of beating cancer sustainably: People, Planet and Protect. Within People, we commit to ensuring we identify, prevent and mitigate the effects of modern slavery in our organisation and our supply chains.



Our operations structure and people

Cancer Research UK group structure



As of 31 March 2022, Cancer Research UK (CRUK) employed 3,962 people, most of whom are based in the UK and work in our offices, shops, research institutes and warehouses.

We also employed 199 temporary workers such as agency workers, contractors and consultants who work across a variety of functions, including fundraising events, stores, customer services and warehouses.

In most cases, people are located remotely or in the sites wholly operated by CRUK mapped below. However, some people may also be located on partner sites (for example, partner laboratories such as the Francis Crick Institute) or locations operated by third-party suppliers on our behalf. These are included in the supply chain structure.

Cancer Research UK sites²

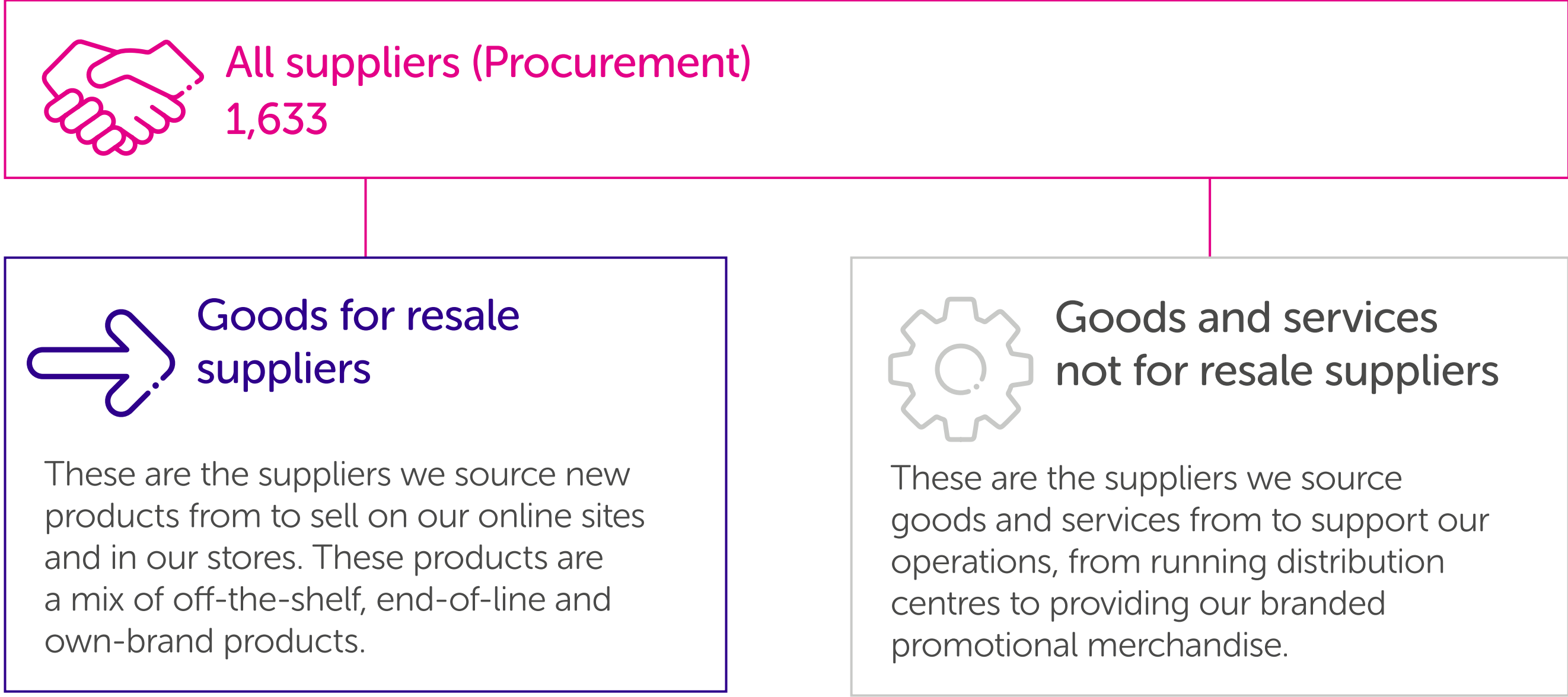


¹ The Beatson Institute for Cancer Research operates independently from Cancer Research UK, including the provision of goods and services which do not meet the criteria for publishing a Modern Slavery Statement. As of the date of publication, the current statement doesn't report on The Beatson Institute for Cancer Research's activities, however we continue explore how we can include activities in the future.

² This reflects sites operated wholly by Cancer Research UK. Several of our sites are operated by third-party suppliers on our behalf – these are included in the supply chain structure.

³ This refers to our shop.cancerresearchuk.org platform. We also sell on four external marketplace platforms: eBay, Depop, ASOS Marketplace and Vestiaire Collective.

Our supply chain structure^{4,5}



⁴ Partners/suppliers who provide donated goods are excluded.
⁵ Supplier numbers are based on spend data 1 April 2021 to 31 March 2022.

Our governance and partnerships

Governance

CRUK is a company limited by guarantee and is a registered charity. It is governed by a Council of Trustees who set CRUK’s strategic direction, monitor the delivery of CRUK’s objectives to uphold its values and governance and guide, advise and support the Chief Executive, who leads the Senior Management Team, in achieving its vision and purpose. It is supported by several Committees. The day-to-day running of CRUK is the responsibility of the Executive Board.

Our approach to sustainability, including human rights, is governed by our Executive Board. The Executive Board are supported by a Sustainability Senior Consultation Group and a team of sustainability specialists. Various departments, such as Trading and Procurement, are responsible for implementing processes that support us in achieving our sustainability vision and obligations, including those concerning human rights. We also have a Sustainability Network made up from people in our organisation who volunteer their time to drive awareness and engagement on sustainability initiatives across the charity.

Our Council of Trustees are ultimately accountable and therefore involved in key strategic decision-making and policy. Our approach to addressing modern slavery is fed into our Council of Trustees through the Audit Committee.

In 2019/20, we conducted an internal audit of our approach to identifying, mitigating and preventing modern slavery. The internal audit team continue to monitor the progress of actions resulting from this report, and provide updates to the Executive Board and Audit Committee at multiple points throughout the year.

In 2022/23, we will review our sustainability resource and governance to support the implementation of CRUK’s developing sustainability strategy.

Partnerships

We are a member of both the Supplier Ethical Data Exchange (SEDEX) and the Business Social Compliance Initiative (BSCI). This enables us to access our suppliers’ shared audits.

Our approach

This section details our approach to identifying, preventing, and mitigating modern slavery in our own operations and supply chain.

As mentioned, in 2021/22 we went through a period of recovery from the impact of the pandemic. This included a restructure which affected the Corporate Social Responsibility team for several months, during which we expanded and redefined our sustainability ambitions. As a result, some sustainability activities were put on hold, including some of the following modern slavery initiatives.

Policies

Our policies set out the minimum standards we set ourselves and those we work with concerning human rights, including modern slavery.

Our operations

The following policies are hosted on an internal learning platform and are signposted within learning modules which have remained mandatory for all new starters to read:

- **Safeguarding Policy** – this sets out our approach to safeguarding and the actions that staff are required to take in dealing with safeguarding concerns.
- **Dignity at Work Policy** – this sets out our position on bullying and harassment and covers all those who work for us including employees, secondees, contractors, agencies, fixed term and temporary workers to ensure everyone is supported and safe.
- **Equality, Diversity and Inclusion Policy** – this sets out our commitment to building a diverse, equal and inclusive environment for all our employees and volunteers through our employment and people practices.
- **Integrity and Ethical Conduct Policies** – these set out key information concerning ethical conduct

and acting with integrity, and are included in our key policies about anti-fraud, bribery, gifts and hospitality, whistle-blowing and conflicts of interest.

- **Whistleblowing Policy** – this encourages staff, volunteers and contractors to report concerns including any related to modern slavery, trafficking and child or forced labour.

Our supply chain

- **Working with Suppliers and Partners Policy** – this sets out internal requirements for buying goods and services to ensure risks are managed appropriately.
- Supplier Code of Conduct – this sets out our standards and the standards expected of our suppliers in relation to the responsible, sustainable and ethical sourcing of goods and services. New suppliers are asked to confirm agreement to this at the point of onboarding and it is underwritten within the terms and conditions of certain supplier contract templates.

Our approach continued

Due diligence

Risk assessment

Risk assessment is the process by which we assess the likelihood of modern slavery occurring in our operations or supply chain. This takes into consideration location, sector and influence, allowing us to focus our efforts and determine the appropriate due diligence to undertake.

Our employees

Permanent employees are considered to be at low risk of modern slavery as we have thorough onboarding and monitoring processes overseen by our Human Resources team, such as right to work and identification checks. Temporary employees can either be directly employed, in which case they go through similar processes to permanent employees, or they are employed through third parties, such as recruitment agencies. Members of this latter group fall within our supply chain risk-assessment and due diligence approach.

Our supply chain

Our goods for resale and goods and services not for resale supply chains are complex, global and span

multiple sectors. We continue to use a previously developed desktop risk assessment framework that primarily considers sector (eg construction compared to event logistics) and influence (ie where we have most leverage and responsibility to drive positive change). If known, the location of workers is also considered.

High-risk suppliers who meet certain criteria (known as focus high-risk suppliers), for example the majority of suppliers of own-brand products, are subject to additional due diligence beyond our policies. Bespoke due diligence processes are sometimes considered for high-risk suppliers who don't meet the criteria for established expanded due diligence, for example the suppliers of the Cancer Care range.

Our approach continued

Investigation, prevention and mitigation actions

This section sets out what we do about actual and potential human rights risks for people in our supply chains.

Department: All

Criteria: None

- During the supplier selection process, some suppliers, for example those with a predicted spend of above £50k, may be required to go through a tender process coordinated by our procurement team. The tender process includes the supplier providing a comprehensive amount of information and providing supporting evidence where applicable. Several of the information requests concern sustainability, including human rights. If expectations aren't met or concerns arise, they could be removed from the selection process.
- The new supplier setup process requires all suppliers to select the category of goods or services they will provide. Certain categories have been identified as needing further review and sign-off by the sustainability team, which could include further tailored due diligence.

Department: Marketing, Fundraising and Engagement

Criteria: Goods for resale suppliers (excluding Cancer Care range), Goods and services not for resale (CRUK-branded items excluding print promotional items)

- All suppliers are requested to complete a modern slavery questionnaire and declare manufacturing facilities of finished goods (tier 2 sites).
- All tier 2 sites are required to be a member of either the Supplier Ethical Data Exchange (SEDEX) or the Business Social Compliance Initiative (BSCI) and provide us with direct access to annual independent ethical audits.⁶
- An internal guidance document supports the review of suppliers' responses to the modern slavery questionnaire and third-party audits. It categorises suppliers as high, medium or low risk and details the appropriate follow-up action.
 - This includes reviewing the audits they provide and requesting evidence that demonstrates improvements they have made against any open non-compliances, or confirmation from independent auditors that non-compliances have been addressed.

⁶ We are members of both the Supplier Ethical Data Exchange (SEDEX) and the Business Social Compliance Initiative (BSCI). This enables us to access suppliers' shared audits.

Our approach continued

Escalation and remediation

We recognise that an audit report is an assessment at a specific moment in time and that compliance is an ongoing journey. Should a manufacturing site fail to meet our minimum due diligence standards and the requirements of local labour laws, we will take appropriate action. In the first instance, we would flag the issue and raise our concerns with the internal team holding the supplier relationship, giving them a timeframe to resolve any issues and support the remediation process to close or improve the outstanding non-compliances.

Where we are unable to resolve issues or gain transparency, we would instruct our tier 1 supplier to remove the factory from our supply chain. This is only done as final action, after all efforts have been exhausted. The priority is to support continuous improvement through monitoring, assessment and engagement.

An agreed action following the audit report in 2019/20 was to develop and implement a formal, documented escalation process for suspected or actual modern

slavery incidents. This document has been drafted, however approval and implementation has been on hold. A review of this will be a priority for 2022/23. In the meantime, any incidents would follow our standard incident management process.

Training and communication

The 2019/20 audit report recommended a formal assessment of our training and awareness needs, however the impact of COVID-19 delayed this and it will be reviewed in 2022/23, taking into account our redefined sustainability ambitions.

Monitoring our effectiveness

Indicators	2021/22
Percentage of new starters who completed mandatory online learning modules	77%
Percentage of focus high-risk goods for resale suppliers with completed modern slavery questionnaires	87%
Number of calls to the whistleblowing line related to modern slavery	0%

In this table there are several key performance indicators used to measure the success of our approach to identifying, mitigating and preventing modern slavery in our own operations and supply chains. Please note that additional key performance indicators and the methodology behind existing will be reviewed in 2022/23 to ensure it is robust and supports year-on-year evaluation of our progress.

Next steps

Following the completion of the restructure undertaken in 2021/22, we are now moving to the next phase. 2022/23 will see us review and, where appropriate, implement previous and ongoing activity together with agreed actions. We will also continue to explore further opportunities to develop our plans in these key areas.

The following section is an indication of potential focus areas for 2022/23. However, the first step will be to review their appropriateness within our redefined sustainability ambitions.

Governance and partnership

- We will review the resources we commit to sustainability whilst continuing to develop and refine our sustainability strategy and the governance structure and process around it.
- Following the above we are likely to see the reinstatement of a modern slavery working group to oversee the implementation of our modern slavery identification, mitigation and prevention programme.
- We will engage with a specialist modern slavery partner or multi-stakeholder initiative to act as a critical friend.

Our approach

Policy

- We will implement an organisation-wide code of conduct, which will articulate the standards of conduct we expect from our employees and everyone that works with us, including our suppliers and partners.
- We will implement an annual review process of our Supplier Code of Conduct to ensure it remains accurate and reflects our current expectations of suppliers.

Due diligence

- We will carry out a review of processes that existed prior to COVID-19 and our restructure, alongside the open actions from the 2019/20 audit report with a view to delivering the identified improvement actions.
- We will review human rights, including modern slavery, within the organisation's risk management and escalation process. This will include reviewing the escalation process for actual or suspected modern slavery incidents with the aim of finalising and implementing a process.

Training and communication

- We will develop a formal assessment of our training and awareness needs and a documented training and awareness plan to address these.

Approval

This statement has been formally approved by the Trustees of Cancer Research UK and signed on their behalf.



Professor Sir Leszek Borysiewicz
Chair, Cancer Research UK

1 September 2022

