

Royal Opera House Modern Slavery and Human Trafficking Statement October 2019 - October 2020

Section 54 of the Modern Slavery Act 2015 requires certain organisation with turnover over £36 million per annum to publish a statement each year outlining the steps it has taken to ensure there is no slavery or human trafficking in its business or supply chain. The Royal Opera House is a large organisation for these purposes and welcomes the opportunity to state very clearly its policy in these respects.

The Royal Opera House unreservedly condemns modern slavery and human trafficking wherever in the world it occurs and is committed to a zero tolerance approach by continuously improving its practices in relation to every part of its business as well as its supply chain. This statement is made on behalf of The Royal Opera House and its subsidiaries but only the Royal Opera House Covent Garden Foundation is required to make this statement.

The Royal Opera House is required to publicise annually, on its website, its activities over the latest financial year aimed towards the eradication of modern slavery and human trafficking. This is our fifth statement to the published.

The Royal Opera House

The Royal Opera House is home to The Royal Ballet, The Royal Opera and the Orchestra of the Royal Opera House. In addition to our Covent Garden site, the Opera House comprises the High House Production Park, Thurrock and the Royal Opera House stores, Aberdare.

Ownership of our Modern Slavery approach sits within our Finance Department. Should there be any questions or concerns as to the implementation of these requirements, please direct them to the [Director of Finance](#).

If any staff are concerned that modern slavery or human trafficking is taking place in our business or supply chains, they should raise their concerns to the [Director of Finance](#) or through the [Whistleblowing policy](#).

The 2019/2020 context

As a result of the COVID-19 pandemic, the Royal Opera House closed its doors to the public on 16th March 2020 and we have since taken the difficult decision to suspend all scheduled performances until the end of 2020, with a much more limited programme delivered from October onwards consistent with COVID 19 protocols regarding social distancing requirements.

This has required a significant shift in how we work, conducting a great deal of our work remotely rather than face to face and many staff across the organisation, including those employed by subcontractors, have spent time on furlough. However, we have continued to take steps that to ensure slavery and human trafficking have no place in our supply chain.

Specifically, we have:

- Adhered to all U.K. government guidance to ensure that all directly employed staff and freelancers have been protected against the risk of contracting COVID-19

- Worked with our facilities contractors throughout this time to ensure that they, too, take all necessary precautions to protect staff working at the Royal Opera House
- Paid cancellation fees to all artists and musicians scheduled to perform at the Royal Opera House during this time
- Continued to apply our high standards for staff recruitment and wellbeing, keeping staff informed about their rights in the workplace and avenues for raising concern *and*
- Circulated guidance to all staff detailing the signs of potential supplier distress, to monitor the impact of COVID-19 across our supply chain and highlight any areas of concern.

Our policies

In order to maintain our high standards of corporate governance, ROH has in place the following policies, which are described in brief on our website and are made available in full staff, suppliers and contractors as required.

- Royal Opera House Modern Slavery and Ethical Sourcing Policy
- Royal Opera House Procurement Policy
- Bullying and Harassment Policy
- Whistleblowing Policy
- Anti-Bribery and Corruption Policy

We note that there were no submissions made via our Whistleblowing avenues in 2020 which related to concerns around modern slavery.

Our risk assessment and due diligence approach

While we are conscious that modern slavery and human trafficking can occur in any sector, the Royal Opera House takes a risk management approach to due diligence.

We segment our suppliers based on contract value, supply sector or the location of the supply chain. This is done using best practice guidance from organisations such as the Ethical Trade Initiative, and we regularly review our approach.

We will decline to enter into or renew a contract with a supplier or potential supplier, if our counterparty is unable to give us sufficient confirmations and commitments.

In 2019/2020 we have continued to be vigilant in making decisions regarding our suppliers and potential suppliers, and to improve our due diligence processes.

Specifically, we have:

- Updated the selection criteria used during tendering processes to include considerations around modern slavery and human trafficking
- Drafted a Supplier Code of Conduct detailing our expectations of our vendors
- Reviewed and strengthened the relevant clauses in our contract terms and conditions
- Reviewed the wording of our standard supplier questionnaire, *and*
- Continued to require suppliers to fill out a questionnaire and analyse their responses, either when during the tender process or at regular intervals

- Drafted a Modern Slavery Action Plan to be appended to relevant contracts, details what steps we expect suppliers to take when modern slavery is identified in their supply chains.

Training and capacity building

Previously, training has been focussed on specific employees and teams, such as the Procurement Manager.

In 2019/2020 we have identified online training which introduces the topic of Modern Slavery and Human Trafficking and gives guidance on how to identify victims or potential victims; in 2020/2021 this online training will form part of ROH's mandatory training requirements of all staff employed across the Royal Opera House, both existing staff and those who are newly recruited.

In 2020/2021 we will also re-assess the need for more detailed training for specific role holders across the organisation and, if required, put in place additional training for key stakeholders.

Ensuring effectiveness

This year we have continued to implement the actions raised in an internal audit review of our work which we commissioned in 2019, and we will continue to do in 2021. Plans for the coming year include:

- Roll out our Supplier Code of Conduct.
- Amend relevant contracts to include clauses on modern slavery and human trafficking
- Require all current and new employees to undertake modern slavery and human trafficking training
- Review the rationale behind our risk matrix for suppliers and, where necessary, make changes
- Append the Modern Slavery Action Plan to relevant contracts.

Approval process

Approved by the Chief Executive Officer Alex Beard

Approved by the Board of Trustees, 13th October 2020