

# Royal Opera House Modern Slavery and Human Trafficking Statement October 2020 – September 2021

## Introduction

Section 54 of the Modern Slavery Act 2015 requires certain organisation with turnover over £36 million per annum ('large organisations') 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 sixth 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. As well as being performed in Covent Garden, our work is experienced across the UK and globally through touring partnerships, cinemas, radio, TV and live-streaming.

Responsibility for 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](#).

## 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 2020-2021 which related to concerns around modern slavery

### **The 2020/2021 context**

As a result of the COVID-19 pandemic, the Royal Opera House closed its doors to the public on 16<sup>th</sup> March 2020 and moved staff to home working. Since March 2020 repeated lockdowns, social distancing guidance and government regulations have limited our ability to re-occupy the building and return to performing.

Through 2020/2021, we have continued to work remotely, 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:

- Continued to adhere to all U.K. government guidance, ensuring that all directly employed staff and freelancers have been protected against the risk of contracting COVID-19
- Continued to work with our outsourced facilities management contractors to ensure that they, too, take all necessary precautions to protect staff working at the Royal Opera House
- Paid cancellation fees to 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*
- Re-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 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 using a risk assessment matrix based on contract value, supply sector and the location of the supply chain. This is done using best practice guidance from organisations such as the Ethical Trade Initiative. Our methodology was reviewed in 2020 and we will review again in 2022. 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 2020/2021 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:

- Reviewed and updated the rationale behind our risk assessment methodology for suppliers and updated the process
- Rolled out a 'self-service' due diligence process for low value/low risk sourcing conducted outside the Procurement team

- Where applicable, included Modern Slavery Act adherence as a minimum standard during tendering processes
- Further refined our Supplier Code of Conduct to address a wider range of social, economic and sustainability factors, as well as Modern Slavery
- Begun to embed updated terms & conditions for the supply of goods and services across the organisation
- Reviewed the format and content of our annual supplier questionnaire and re-issued this to key suppliers in August 2021.

### **Training and capacity building**

In 2020/2021 we identified online training which will form part of ROH's mandatory training requirements for those staff employed across the Royal Opera House with procurement and contract management responsibilities. This will be rolled out during 2021/2022.

We will also continue to assess the need for more detailed training for specific post holders across the organisation and, if required, put in place additional training.

Finally, we will run an awareness raising campaign across the entire organisation and all our sites on the topics of modern slavery and human trafficking.

### **Ensuring effectiveness**

This year we have continued to implement the actions raised in an internal audit review of our work commissioned in 2019.

While most of the issues raised have been addressed, the disruption of the past year has limited our ability to embed new processes across the organisation, so we will continue to do so in 2021-2022.

Plans for the coming year include:

- Analyse the data received in August 2021 to update our supplier risk register
- Roll out our Supplier Code of Conduct to key suppliers
- Require all relevant employees to undertake modern slavery and human trafficking training
- Conduct an awareness campaign for all staff across ROH's three sites
- Continue to assess Modern Slavery Act adherence to our supplier selection processes

### **Approval process**

Approved by the Chief Executive Officer Alex Beard, 5<sup>th</sup> October 2021

Approved by the Board of Trustees, 5<sup>th</sup> October 2021