

Modern slavery statement



Modern slavery is an abhorrent crime and a violation of basic human rights. Modern slavery is a complex, global issue, which takes many forms and includes human trafficking, forced labour and servitude.

Wellcome's position is clear: modern slavery has no place within our organisation and we expect those who work with and for Wellcome to uphold and respect these standards.

Wellcome strives to operate to the highest ethical standards in all our work, in our business dealings and wider relationships. We are cognisant that the Covid-19 pandemic has created new dangers for the victims of modern slavery. Those who seek to profit from global economic and social disruption utilise this time to look for alternative and new ways to operate and continue their exploitation of the most vulnerable. Wellcome has a responsibility to be alert to emerging modern slavery and human trafficking risks both in the UK and globally. We are proactively taking steps to enhance our understanding and mitigation of modern slavery risks within our organisation and beyond.

This statement provides some background to our organisation and our supply chains. It also sets out the work that we have undertaken during the financial year ended 30 September 2020 to ensure that modern slavery and human trafficking are not taking place either in our organisation or within our supply chains.

A handwritten signature in black ink that reads "Eliza Manningham-Buller".

Eliza Manningham-Buller, Chair

A handwritten signature in black ink that reads "Jeremy Farrar".

Jeremy Farrar, Director

14 December 2020

About us

Wellcome is a politically and financially independent global charitable foundation that supports science to solve the urgent health challenges facing everyone. As a primarily grant-giving charity, our investment portfolio gives us the independence to support discovery research into life, health and wellbeing, as well as taking on three worldwide health challenges: mental health, global heating and infectious diseases.

Our organisation

Wellcome is a charitable trust and our sole trustee is The Wellcome Trust Limited, a company limited by guarantee. We have two subsidiaries that are registered charities in England & Wales (Genome Research Limited and Hinxton Hall Limited), two trading subsidiaries that support our own activities (Wellcome Trust Trading Limited and WT Construction Limited), a number of other subsidiaries that support our investment portfolio, and a finance subsidiary (Wellcome Trust Finance plc).

This statement covers: the Wellcome Trust, The Wellcome Trust Limited, Wellcome Trust Trading Limited, WT Construction Limited and Wellcome Trust Finance plc. Genome Research Limited is preparing a separate modern slavery statement to cover its operations and the activities of its subsidiaries, including Hinxton Hall Limited. We have two investment operating businesses, Farmcare Trading Limited and Premier Marinas Holdings Limited and its group, that are independently managed and responsible for managing their own supply chains. Farmcare Trading Limited and Premier Marinas Holdings Limited are not required to produce their own modern slavery statements.

Governance

Our activities are overseen by our [Board of Governors](#), who have ultimate responsibility for all that we do. Wellcome's day-to-day management is delegated to the Director (supported by the [Executive Leadership Team](#), which reports directly to the Board of Governors).

More information about our governance framework can be found [here](#).

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Wellcome's approach

Wellcome strives to act responsibly and ethically in the way that we operate. We are explicit that how we do things is as important to us as what we do.

We are a London Living Wage accredited employer and employ over 900 people, operating out of our central London headquarters. We have taken steps to ensure that those who work with us operate to similar standards, for example by implementing contractual safeguards with our facilities management service partners to ensure that their staff are paid the London Living Wage as a minimum standard.

We are continually looking to challenge and develop our understanding of modern slavery risk within our organisation, and beyond. To strengthen our commitment to identifying and tackling modern slavery risks, this year Wellcome has commenced a partnership with Unseen UK, a leading charity that works to end modern slavery. Through this partnership, Wellcome now supports Unseen UK's nationwide Modern Slavery Helpline, which provides a confidential reporting line and also offers vital support for the victims of forced labour, as well as for those who report concerns.

Through this partnership, and by listening and learning from Unseen UK's first-hand insights and expertise, Wellcome will be better able to shape and develop its approach to modern slavery. Our collaboration with Unseen UK provides the opportunity for independent assessment of our current risks, coupled with the support of Unseen UK's analysis of current and emerging trends. This increased awareness will enable our organisation to further increase transparency within our operations and supply chains.

Our policies and procedures

Over the past year, Wellcome has continued to update our framework of policies and procedures. Whilst they are key to implementing effective systems and controls, we also believe that they are a fundamental ingredient in reinforcing our culture of integrity and transparency. Our policies outline the behaviours and conduct that we would expect of each other at Wellcome and apply to our work externally.

Our policies and procedures are regularly monitored and reviewed and apply to all our employees and to anyone engaged to work for us on a temporary basis.

The key policies and procedures that contribute to minimising the risk of modern slavery and human trafficking in our organisation and our supply chains are:

- **Speak Up policy:** Wellcome works hard to create an open and transparent culture. We are listening to our staff, and our Speak Up policy encourages anyone working at Wellcome to report any concerns about suspected, or actual, wrongdoing. Anyone with concerns can report them through our Speak Up reporting line and web portal and has the option to remain anonymous. We have also partnered with the whistleblowing charity Protect to offer an independent, confidential advice line to Wellcome colleagues.

- **Code of Conduct:** our Code of Conduct brings together all our conduct-related policies and underpins our expectations of how we work with each other, as well as with our external partners.
- **Bullying and harassment policy:** this is designed to help ensure that all our staff and anyone that we fund is treated with both dignity and respect.
- **Risk management policy:** this is designed to keep all our activities in line with all applicable laws, regulations and codes of governance (including in relation to modern slavery and human trafficking).
- **Health, safety and environment policy:** a key aim of this is to ensure the wellbeing of all our employees and anyone else who may be affected by our activities.
- **HR procedures:** we check that all our staff have appropriate right to work documents and ensure that they are paid fairly and enjoy a competitive remuneration package. We have procedures in place to safeguard the interests of young people and any unpaid work experience volunteers at Wellcome.
- **Procurement policy:** this sets out a number of factors to be considered when selecting our suppliers, including whether the supplier will be a good business partner for Wellcome. This in turn involves considerations of supplier reputation and compliance with laws and ethical procedures.
- **Agreements policy:** our template agreements and standard terms and conditions require suppliers to comply with the law and include specific provisions in relation to modern slavery and human trafficking.
- **Fraud and corruption policy:** this reminds our people to be alert to any improper conduct or suspicious behaviour and provides guidance on how to report their concerns about risks related to fraud and corruption.

Wellcome's Procurement team continues to review and strengthen our centralised procurement processes and policy, by considering a range of risks, including modern slavery and human trafficking.

Our supply chain

We use suppliers to support the operations of our organisation. The key areas in which we engage suppliers are:

- * Facilities management
- * Information technology
- * Finance
- * Legal
- * Our People team
- * Investments

Our supply chain due diligence

Modern slavery is not tolerated within Wellcome's operations and we expect those who work with us, or on our behalf, to respect and adhere to these values.

We carry out an annual due diligence exercise on our key suppliers to ensure that they have appropriate policies in place to minimise the risk of modern slavery and human trafficking within their business and onward supply chains. We also check for certain key performance indicators such as training and paying the London Living Wage or the National Living Wage.

Our key suppliers are assessed based on their geographic location and the nature of their business or services. Based on this year's review, we are satisfied that our key suppliers have appropriate policies in place and that these policies are being regularly reviewed and updated.

We have supplier due diligence and monitoring processes in place for new and existing suppliers. Our Procurement team, assisted by our Legal team, continue to look for ways to improve our supplier due diligence process, to ensure that we are working with organisations that have controls in place to minimise risks, including the risk of modern slavery and human trafficking.

Our Procurement team is also looking to foster long-term relationships with suppliers, through which policies aimed at minimising a range of risks (including the risk of modern slavery and human trafficking) can be advanced.

Our grant and investment activities

We deal with many organisations through our grants and investments activities. We have carried out an assessment of key aspects of these activities to understand the risk of modern slavery and human trafficking in these areas and how any such risks could be mitigated.

Grant activities

We believe that the risk of modern slavery occurring within our grant funding activities is low, based on the nature of our funding and the location of our grant recipients. More than 75% of Wellcome's funding is awarded to UK academic and research organisations.

In November 2019, Wellcome became a Living Wage Funder and made a commitment to ensure that the many thousands of people funded through our UK-based grants are paid at least the real Living Wage. The real Living Wage is an independently calculated, voluntary rate of pay that is based on the actual cost of living. We fund nearly 10,000 people in the UK though our grants. These are mostly research staff working in UK universities, but we also fund people working in the third sector undertaking public engagement and education activities relating to health.

Wellcome recognises its responsibility to ensure that we are providing funding to organisations that uphold similar standards to our own. This year we have undertaken due diligence on the 25 UK organisations that receive the largest proportion of grant funding from Wellcome (representing more than 90% of Wellcome's total grant funding within the UK). This process ensures that these organisations have appropriate policies and procedures to minimise the risk of modern slavery taking place within their own operations, and that these policies and procedures are reviewed and updated annually.

Many international grant-holders do not explicitly consider modern slavery in their policies and procedures as this is not a legal requirement for them. However, as part of our internal audit process (which applies to both our UK and international grant-holders) our internal audit team:

- Asks our grant-holders what steps they take to minimise the risk of modern slavery and human trafficking.
- Reviews our grant-holders' procurement processes (including supplier due diligence processes).
- Makes best practice recommendations to mitigate the risk of modern slavery and human trafficking, where appropriate.

We will continue to monitor our grant-holders in this respect through our audit activity.

Investment activities

Based on our review of the directly owned public companies, key directly owned private companies and operational and property-backed businesses in our investment portfolio, we are satisfied that the large majority have appropriate policies and procedures in place to minimise the risk of modern slavery and human trafficking. Those companies that lack specific policies on these issues are mostly companies that we consider to be low risk given the nature and location of their employees. Only in a very small number of public companies, where we are a small shareholder, do we consider there to be a potential risk. We continue to engage with the management of these companies on this issue.

The yearly review with regard to modern slavery is part of a broader process of continuous monitoring of our investments. As Wellcome is a long-term investor with a time horizon measured in decades, the companies and funds in which we invest must have a strong social licence to operate as well as a sound and sustainable business model. We engage closely with them so that we can be confident they take their environmental, social and governance responsibilities seriously. There have been instances where we have sold positions that in our view did not meet this test.

Training

We try to ensure that adequate information and training is provided to all our employees, contractors or visitors on all relevant matters. Here are some examples of the information and training we provide:

- Everyone working at Wellcome is required to complete our mandatory Code of Conduct digital learning module, which reinforces Wellcome's values and the expected standards of conduct that are outlined in our policies and procedures.
- Managers are provided with a range of leadership training and are assisted by our HR team in HR-related matters including recruitment, remuneration and employee wellbeing.
- Our procurement team, assisted by our legal team, routinely seeks out information and training to help identify and address risks in both our organisation and supply chain (including in relation to modern slavery and human trafficking) and will continue to do so.

Looking ahead

Over the next year we hope to:

- Continue to listen and learn through our partnership with Unseen UK and to use their knowledge and expertise to develop Wellcome's thinking around modern slavery and identify the risks that are relevant to our organisation and beyond.
- To raise awareness of modern slavery risks within Wellcome, provide training sessions to key teams within our organisation, and seek to build engagement of all staff on modern slavery more broadly.
- Work with other major UK funders, through our grant activities, to develop a fit for funding statement that all new grant-holding organisations will need to complete. This statement will require organisations to assure us they can comply with key grant funder conditions and policies, including our requirement that they have implemented appropriate policies and procedures to mitigate the risk of modern slavery within their operations.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Wellcome's modern slavery and human trafficking statement for the financial year 1 October 2019 to 30 September 2020.