

Modern slavery statement for financial year 2018/19

This statement is made in response to s.54 of the Modern Slavery Act 2015 and sets out the steps that the Barbican has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The Barbican has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

The Barbican is an international arts centre based in the City of London. Founded and principally funded by the City of London Corporation, the Barbican presents world class arts and learning work across all major art forms including dance, film, music, theatre and visual arts.

The centre opened in 1982 and comprises the Barbican Hall, two theatres, three cinemas, two art galleries, foyers and public spaces, a library, Lakeside Terrace, a glasshouse conservatory, conference facilities and three restaurants.

Progress on Modern Slavery since 2017/18

Over the last year the Barbican has taken a number of new steps in order to ensure the necessary measures are in place to safeguard against modern slavery taking place within the business or its supply chains. These include:

- As committed to in the Barbican's 2017/18 Modern Slavery statement, throughout the year the Barbican has rolled out new standard clause across its contracts committing suppliers to comply with the Barbican and City of London's policies on modern slavery and human trafficking. These clauses are now part of the standard terms and conditions for Barbican contracts, setting out our expectation that suppliers do not engage in modern slavery or human trafficking
- Alongside the new Modern Slavery contract clauses, the Barbican has also introduced new standard contract clauses to ensure any person engaged or managed by contractors or suppliers at the Barbican is treated with dignity and respect in compliance with the City's Equal Opportunity policy. This clause aims to mitigate risks around suppliers engaging in or enabling harassment and/or illegal working practices
- The publication of the Barbican's first modern slavery statement in 2017/18 was widely communicated to staff via the organisation's intranet. This asked all staff to familiarise themselves with the steps the organisation was taking to ensure modern slavery is not occurring in its supply chain and directed staff to the City Corporation's online training module which outlines steps everyone can take to help identify and report potential issues in this area. The information disseminated to staff also reminded them of the City Corporation's Whistleblowing Policy and informed them that any concerns they had regarding potential instances of modern slavery could be raised in this way
- The Barbican has contributed to the establishment of the City Corporation's inter-departmental Working group on modern slavery. This group includes representatives from the Barbican, City of London Police, City Procurement, Department for

Community and Children's Services, Community Safety and Corporate Strategy and Performance Team. The group bring together all current action taking place to tackle modern slavery by the City Corporation, to harmonise the organisation's approach and ensure that resources and lessons learned are shared across the City Corporation. This group has been responsible for the development of the City Corporation's first organisation-wide modern slavery statement which was published in September 2018

Future areas of development

The Barbican will continue to work with and contribute to the City of London Corporation's inter-departmental working group on modern slavery to ensure the organisation remains committed to assess the organisation's effectiveness in this area, bridge identified gaps, developing appropriate performance indicators, monitoring and reporting on progress.

Steps this group will take over the coming year include:

- Creating a network of Safeguarding champions across City departments who will acts as departmental points of contact and channels for dissemination of key messages to and from the Working Group
- Identify any gaps or weaknesses and plan future interventions and areas for potential collaboration. This includes increasing the number of internal and external training and awareness raising initiatives in relation to modern slavery and human trafficking
- Ensuring Chief Officers instruct line managers to encourage all staff to take a high-level version of the City Corporation's online modern slavery training. The number of staff that have undertaken this training will be used as a performance indicator of information dissemination going forward.
- Working with the City Procurement team to continue to ensure the aims of the City of London Corporation's Responsible Procurement Strategy are implemented. This includes ensuring procurement decisions act as a catalyst for positive change across three key areas; social value, environmental sustainability and ethical sourcing. The latter details the City Corporation's commitment to tackling human and labour rights violations, including but not limited to modern slavery
- Contributing to City Procurement's development of a Supplier Code of Conduct with the aim of detailing the City Corporation's expectations more clearly to our supply chain and facilitating a more rigorous approach to contract management

Our policies

Alongside the new actions set out above, the Barbican continues to operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

Recruitment policy

We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. All offers of employment are conditional on these eligibility and right to work in the UK being completed to the organisation's satisfaction.

Where an individual is working in the UK on a visa or work permit of a fixed term, the Barbican, as part of the City of London Corporation, will require the individual to provide

proof of their continuing right to live and work in the UK checks before continuing their employment.

These processes are managed and overseen by our HR department and guidance is provided to all recruiting managers to ensure these checks are carried out effectively.

These eligibility checks ensure all employees have the right to work in the UK and help safeguard employees from any abuse and coercion once in our employment.

London Living Wage

The Barbican, through the City of London Corporation, is proud to continue to be an accredited London Living Wage employer. This commits us to paying all staff and contractors working at the Centre on Barbican or City Corporation-wide contracts for two or more hours at least the London Living Wage.

Over the past year the City Corporation has strengthened and enhanced its Living Wage policy, taking the decision to pay its own staff and its suppliers' staff the new rate, with immediate effect, when the updated London Living Wage is announced in November each year. This is opposed to paying staff the new rate from April the following year, which is the most common approach taken by employers.

The City Corporation has also committed to running a campaign in 2018/19 to encourage financial and professional services firms in the Square Mile to pay the London Living Wage. The campaign will highlight the commercial and societal benefits of paying the London Living Wage.

Code of conduct

Our continued success relies on the trust and confidence of the public and therefore all Barbican staff are expected to uphold the highest standards of personal conduct and integrity including a requirement for all Barbican staff to uphold the [Nolan Principles on standards in public life](#)

As a department of the City of London Corporation, Barbican employees must adhere to the [City of London's employee Code of Conduct](#). This incorporates requirements to abide by City of London anti-corruption measures and that all employees are treated with fairness and equality.

The code also sets out the expectation that employees, and others that we deal with including suppliers, who have serious concerns about the conduct of any aspect of the City Corporation's work to come forward and voice those concerns to us. It commits the City of London Corporation to treating any suspicion of wrongdoing seriously with concerns reviewed and analysed in accordance with the Whistleblowing or Complaints Policy, considering the Public Interest Disclosure Act, the Human Rights Act and if appropriate the City Corporation's Anti-Fraud and Corruption Strategy.

Whistleblowing policy

[The City of London Corporation's Whistleblowing policy](#) applies to all Barbican staff. Alongside staff being encouraged to raise any concerns they have through line management channels, this policy provides a mechanism for employees to raise serious concerns that they have without fear of reprisals in order that they may be swiftly resolved.

Ethics policy

This financial year the Barbican has published an ethics policy which commits Barbican staff to follow the highest levels of personal conduct and integrity as well as undertaking risk assessment procedures to ensure any risk events or partnerships may cause to the City of London Corporation's and the Barbican's reputations, policies, and working practices are mitigated and/or prevented.

Responsible business strategy

The City of London Corporations's [Responsible Businesses Strategy](#) commits the Corporation to embedding responsible business practices in its work and decision making processes. This strategy includes a commitment to promoting human rights through its decision-making processes so that people are treated appropriately and with dignity.

Our Suppliers

The Barbican tenders for contracts through the City of London Corporation's procurement team. City Procurement is the City Corporation's centralised procurement team who deal with the majority of contracts worth £10,000 or more. Exceptions to this include agreements between the Barbican and its artists and services commissioned by the Department for Community and Children's Services. Interventions described in this section relate to those contracts for supplies, services and works over the £10,000 threshold. Staff undertaking procurement exercises below this value on behalf of the Corporation will be encouraged to undertake online training to ensure they consider the risks of modern slavery as part of their due diligence processes.

City Procurement take the lead on tackling modern slavery within supply chains, but work in conjunction with stakeholder departments with the greatest risk of procuring goods, services or works associated with this crime.

The highest risks of people falling victim to modern slavery in our UK-based supply chain include construction workers, those undertaking service contracts in relatively low paid industries such as cleaning, catering, security, agriculture and the care industry. Although not necessarily defined in the same way, the City Corporation recognises that those industries can often operate as part of the gig economy

The highest risks of modern slavery further up our globalised supply chain, especially forced and child labour, are associated with the production and manufacture of electronic equipment, textiles, agricultural commodities and construction materials. Conflict minerals including gold, tin, tantalum and tungsten, found in computer equipment and vehicles are also of significant concern.

The City Corporation's [2015-2018 Responsible Procurement Strategy](#) aims to deliver best value in a way that improves the lives of those in its supply chain and help the City Corporation make procurement decisions that act as a catalyst for positive change. It is based on three pillars; social value, environmental sustainability and ethical sourcing. The latter details the City Corporation's commitment to tackling human and labour rights violations, including but not limited to modern slavery.

Measures the City Procurement team undertake to ensure supplier compliance with the Modern Slavery Act include:

- All relevant suppliers that wish to tender for City Corporation contracts must provide evidence that they have met the requirements of the Modern Slavery Act 2015 in order to be able to bid. This means all suppliers who turnover more than £36m per annum and operate in the UK must provide a URL to their modern slavery statement

as part of a pass/fail criterion in either the Supplier Questionnaire (SQ) or qualification envelope.

- A series of interventions are currently being used as part of the specification of contracts with high risk categories to ensure compliance with human and labour rights legislation; in particular the eight UN International Labour Organisation (ILO) fundamental conventions, alongside the UK's Modern Slavery Act. Requirements are developed by the Responsible Procurement Manager, in collaboration with stakeholder departments, on a case-by-case basis according to the nature of the contract in question. They are usually comprised of a set of flexible, continuous improvement requirements including supply chain mapping exercises, contractual provisions, relevant affiliations, awareness raising and auditing. Departmental leads, with support from the Responsible Procurement Manager and/or the Commercial Contract Management team must ensure that these milestones are met as part of the contract management process.
- The City Corporation helped establish and co-Chairs the London Responsible Procurement Network (LRPN), a group of public sector representatives who meet regularly to share best practice and develop harmonised approaches to achieving social value, environmental sustainability and ethical sourcing. This Group also feeds into the London Heads of Procurement Network, facilitated by London Councils. A series of meetings and workshops dedicated to modern slavery have already taken place with the aim of sharing effective interventions and learning lessons from one another on how to effectively tackle modern slavery within London's public sector supply chains.

In addition to the procurement measures outlined above and as committed to in its 2017/18 statement, the Barbican has recently introduced a standard clause in all its future contract for services and suppliers that commits suppliers to comply with the Barbican/City Corporation's Policies on modern slavery and human trafficking, both in engaging the supplier's own staff or in relation to sub-contractors and agents.

Additional clauses also recently introduced require suppliers to ensure they fulfil the obligations set out City Corporation's Equal Opportunities Policy and ensure all staff and all other people engaged or managed by external suppliers and visiting companies are treated with dignity and respect.

Over the next year the Barbican will contribute to City Procurement's development of a Supplier Code of Conduct with the aim of detailing the City Corporation's expectations more clearly to our supply chain and facilitating a more rigorous approach to contract management.

Further information about City Procurement's approach to tackling modern slavery can be found in the [City Corporation's modern slavery statement](#).

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified
- Companies supplying the Barbican have a clear understanding of our approach to ensuring that modern slavery or human trafficking are not occurring in our supply chain and are aware of the consequences should their operations breach our agreements with them
- Staff feel informed and empowered to report any concerns they have regarding potential instances of modern slavery or human trafficking

Approval for this statement

This statement was approved by the Barbican Board on (add date)