



Modern Slavery Policy

Document ID: LGPOL05

Version: 2.0

Document Control

Version	Date	Author(s)	Comment	Approval
1.0	3 Oct 19	Helen Storey	Final	NOC Board
2.0	24 Nov 20	Head of Legal	Annual review – no changes	NOC Board

Policy Owner:	<i>Associate Director (AD), Corporate Business Support (CBS)</i>
Last Review/Update Date:	November 2020
Next Review/Update Date:	November 2021 (review agreed with policy owner for Sept 22)
Deletion Date:	<i>When a Policy is superseded or no longer required.</i>

CONTENTS

1.	Scope.....	3
2.	Purpose.....	3
3.	Policy.....	3
4.	Monitoring and Evaluation.....	5
5.	Associated Documentation.....	5

1. Scope

- 1.1 This policy applies to all NOC employees and contractors and has particular relevance in specific areas including recruitment, risk, assurance and procurement. The policy outlines the NOC approach to the issue of modern slavery and should be read in conjunction with the policies on recruitment, procurement, fraud, bribery and whistleblowing.

2. Purpose

- 2.1 The purpose of this policy is to ensure adherence to the Modern Slavery Act 2015 and prevent slavery and human trafficking in all NOC activities and to ensure that its supply chains are free from slavery and human trafficking. It seeks to ensure that employees are aware of the requirements placed on them, suppliers, contractors and business partners regarding combating modern slavery and human trafficking. It also seeks to provide employees with the opportunity and protection they need to raise concerns.

3. Policy

Definitions

- 3.1 Modern slavery takes various forms, including slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Someone is in slavery if they are forced to work through mental or physical threat, owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse, dehumanised, treated as a commodity or bought and sold as 'property', physically constrained or have restrictions placed on his/her freedom.
- 3.2 The following definitions are encompassed within the term 'modern slavery' for the purposes of the Modern Slavery Act 2015. These are:

'slavery' is where ownership is exercised over a person
'servitude' involves the obligation to provide services imposed by coercion
'forced or compulsory labour' involves work or service extracted from any person under the menace of a penalty and for which the person has not offered himself voluntarily
'human trafficking' concerns arranging or facilitating the travel of another with a view to exploiting them.
- 3.3 The supply chain refers to the entire network of entities, directly or indirectly interlinked and interdependent in serving NOC in the UK and any other country within which NOC operates.
- 3.4 The Modern Slavery Act 2015 details the penalties for those found guilty of an offence under Section 1 or 2 of the Act and include imprisonment for life.

Policy Statement

- 3.5 NOC is committed to the implementation and promotion of ethical business practices to protect staff from being abused and exploited and expect the same high standards from its contractors, suppliers and other business partners. NOC understands its obligations under the Modern Slavery Act 2015 and is committed to preventing slavery and human trafficking in all its activities, whether conducted by its staff or throughout its supply chain.

- 3.6 The contracting process will include specific prohibitions on the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and NOC will work to ensure that our suppliers hold their own suppliers to the same high standards.
- 3.7 Those employees in relevant roles must advise UK suppliers, contractors and business partners that NOC requires them to adhere to the Modern Slavery Act 2015. UK suppliers and overseas organisations that carry on business within the UK that fall within the scope of the act, will need to provide evidence, such as their annual Modern Slavery and Human Trafficking Statement, that this is the case. When dealing with overseas suppliers and partners that do not fall within the scope of the Act, staff must advise them that they are required to act within the spirit of the Modern Slavery Act 2015 and raise awareness of modern slavery and human trafficking with their own suppliers and contractors. The precise requirements and compliance procedures will be included in contracts, Terms and Conditions and other relevant agreements. Further guidance is available in the relevant Procedures.
- 3.8 We may terminate our relationship with individuals and organisations working on our behalf if they breach this policy. We may also inform the police.
- 3.9 We will work to ensure our internal processes and external supply chains are free from slavery and human trafficking. Where any concern is raised we will investigate and address it.

Roles and Responsibilities

- 3.10 The NOC Board is accountable for ensuring NOC complies with the relevant legal and ethical obligations.
- 3.11 The Head of Legal and Governance is responsible for ensuring:
- The Modern Slavery Policy remains up to date and relevant to NOC.
 - The annual modern slavery and human trafficking statement is compliant with the Modern Slavery Act 2015.
 - The annual statement is produced, approved and published within the correct timescales on the NOC website.
 - Overseeing the reporting process and establishing remedial procedures to address any suspected breaches of the Modern Slavery Act or this policy.
 - Overseeing contracting and procurement activities to ensure compliance with this policy.
 - Overseeing internal audit and compliance activity to ensure compliance with this policy.
- 3.12 The Head of Science and Project Support is responsible for ensuring that project risk assessments include consideration of modern slavery risks in working with project partners and suppliers. More detail on this may be found in the relevant policy.
- 3.13 The Annual Modern Slavery Statement should include the following:
- NOC's structure, business and supply chains;
 - note of policies in relation to slavery and human trafficking;
 - due diligence processes;
 - the parts of the business and supply chains at risk and steps taken to manage risks;
 - effectiveness in ensuring that slavery and human trafficking is not taking place; and
 - training available to staff.

- 3.14 Line managers are responsible for ensuring those reporting to them understand and comply with this policy.
- 3.15 All employees, if they consider there may be a risk of modern slavery, are expected to raise this issue to their line manager and/or the Head of Legal and Governance. This applies whether there is a concern about a particular act, the treatment of workers more generally, or the working conditions within any part of our business or supply chains.
- 3.16 NOC aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting, in good faith, their suspicion that modern slavery in any form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Head of Legal and Governance immediately.

Training

- 3.17 Training on this policy and on the risk NOC faces from modern slavery in its business activities and supply chains, forms part of the induction process for all employees.

Consequences of breach of policy

- 3.18 Any member of staff who breaches this policy will be dealt with under the NOC Disciplinary Policy.

4. Monitoring and evaluation

- 4.1 This policy will be monitored and its effectiveness evaluated through internal audit and compliance activity to be undertaken by the Legal and Governance Group. The Board will provide oversight of this activity and one of the Directors will sign the annual statement.
- 4.2 Concerns will be reported to Executive and investigations and risk activity managed through the governance structures as appropriate to the circumstances. The policy will be reviewed as appropriate.

5. Associated Documents

Ethics Policy
Code of Conduct
Whistleblowing Policy
Disciplinary Policy
Recruitment Policy
Grievance Policy
Investigation Procedure