

The logo consists of a black square outline. Inside the square, the text "National Oceanography Centre" is written in a black, sans-serif font, stacked in three lines.

National
Oceanography
Centre

The background is a photograph of a person standing on a concrete pier or breakwater, looking out at the ocean. The sky is a mix of orange, yellow, and blue, suggesting a sunset or sunrise. The water is dark blue with small waves.

MODERN SLAVERY & HUMAN TRAFFICKING

STATEMENT 2023/24

WHO WE ARE

The National Oceanography Centre (NOC) is a truly multi-disciplinary centre encompassing research in Marine Geoscience, Marine Physics and Ocean Climate, Marine Systems Modelling, Ocean Biogeochemistry and Ecosystems, and Ocean Technology and Engineering. NOC is home to the nation's marine data assets; the British Oceanographic Data Centre (BODC), the British Ocean Sediment Core Research Facility (BOSCORF) and the Discovery Collections.

As an organisation, NOC's vision is to lead as the world's most innovative oceanographic institution, and to contribute towards global efforts to achieve clean, safe, healthy, productive and biologically diverse oceans and seas.

NOC was established in 2018 as a charitable organisation limited by guarantee. Bound by the principles set by the Charity Commission, NOC is committed to being transparent in all business conducted including the disclosure of risks related to Modern Slavery & Human Trafficking. NOC's suite of policies and procedures include a Modern Slavery & Human Trafficking Policy which outlines expectations for employees related to this matter. Whistleblowing policy and procedures are also available which aim to support and guide employees who want to report organisational wrongdoing where other reporting options are not appropriate.

NOC's Board of Trustees are supported by an Audit & Risk Committee, an Ethics Committee and a Sustainability & Social Responsibility Committee. All of which are responsible for maintaining NOC's integrity in matters that could cause risk to NOC, particularly where partnering with third-party organisations. This is a risk area that is taken very seriously so as not to expose NOC to corrupt organisations or those that have links with Modern Slavery and Human Trafficking. As a national and international organisation, NOC is mindful of the additional risk faced with working across the globe and NOC takes appropriate steps to protect its reputation and integrity.





MANAGING RISK

All employees across the organisation at all levels have a duty to manage the risks that arise as NOC pursues its strategic objectives. This helps to ensure that NOC Executive and Board are well informed to make the right decisions and that risk mitigation can be supported at the highest level.

The consideration of risks relating to Modern Slavery & Human Trafficking remains of high importance in all of NOC activities. Risk Management at NOC consists of routine discussions at all levels within the organisation. Additionally, meetings take place on a quarterly basis to review and discuss strategic risks, current controls and required actions for remediation. Currently, NOC's known areas of risk relating to Modern Slavery & Human Trafficking include procurement of goods and services, recruitment of employees, and working abroad.

PROCUREMENT OF GOODS AND SERVICES

NOC has a dedicated procurement team in place to assist employees in making sustainable and ethical choices when purchasing goods and services. The team work across all NOC divisions to provide bespoke services, support employee's and provide assurance that the suppliers NOC work with are assessed and operate their own Modern Slavery & Human Trafficking prevention measures.

NOC's sustainable procurement strategy includes:

- Working with suppliers to implement ethical practices aligned to NOC's social responsibilities;
- Increased use of UK based manufacturers to replace non-UK manufacturers where this results in a lower risk profile for NOC and increases Social Value including the prevention of Modern Slavery & Human Trafficking;
- The prudent use of natural resources.

NOC currently has c.1,500 suppliers registered for use by employees to purchase goods and services. It is believed that reducing this to around 1,000 will be sufficient for NOC's needs and allow for better supplier management and control. Of the current suppliers, 84% are UK based, 9% are based in Europe and 7% are the Rest of the World.

All suppliers are asked to sign up to the NOC Supplier Code of Conduct. Clauses in this code include:

- Compliance with the Modern Slavery & Human Trafficking Act;
- That sub-contractors adhere to similarly robust terms;
- The notification of any links to Modern Slavery & Human Trafficking as they may occur, particularly where this relates to services provided to NOC;
- The maintenance of relevant documentation as an audit trail and;
- The requirement to declare any prior or current convictions or, connections with companies with prior or current convictions, in regard to Modern Slavery & Human Trafficking at time of signing up to the Code.

NOC is keen to support its supplier network, and in particular, where a supplier is an SME, a proportionate approach is taken so as not to unreasonably disqualify them as a result of unrealistic expectations. NOC also commits to paying fair market prices for goods and making payment within the specified time frame given by the supplier.

The majority of goods are purchased through procurement with only emergency goods or out of hours requirements procured by end users.

RECRUITMENT OF EMPLOYEES

NOC has a dedicated recruitment team that guide and facilitate the recruitment of new employees across the organisation. From advising on job description content, interview support, and the fair selection processes, NOC operate a recruitment practice that is appropriately thorough and robust. The recruitment process includes important checks to ensure that NOC employment procedures are considering the risk of links to Modern Slavery. This includes ensuring, as much as possible, that all interviews are either in-person or online video calls and the checking of passports and or VISA's. This aims to ensure that NOC can confirm the candidate's identity and their right to work in the UK status.

NOC works to ensure the recruitment agencies it uses are vetted and that they have

measures in place to prevent Modern Slavery & Human Trafficking.

NOC currently uses two recruitment agencies for placing mariners for ship's crew, both of which are subject to adherence to the Maritime Labour Convention (MLC) 2006. This is independently confirmed by the Maritime Coastguard Authority who subjects recruiters of mariners to annual audits. NOC requests and holds copies for completed annual audits as assurance that recruiters meet requirements.

Adherence to the Maritime Labour Convention 2006 affords workers with the rights to fair employment conditions, including wages, working hours, rest and leave, minimum accommodation standards, access to medical care and health and safety measures and the right of complaint where these rights are not being met. The Maritime Labour Convention also requires workers to be of at least 16 years of age and to have verified medical and training certificates. All mariners must carry a Seafarers Employment Agreement which confirms that they are covered under the Maritime Labour Convention 2006.

WORKING ABROAD

Due to the nature of NOC business, many employee's at times will travel through the UK and abroad to conduct NOC business. Travel includes by conventional means (train, plane, automobile) or travelling as part of the ship's crew for a research expedition. Training is provided to all new starters at NOC which covers the signs of Modern Slavery & Human Trafficking and what actions should be taken in order to report a suspected instance. This includes the possibility of witnessing signs of Modern Slavery & Human Trafficking whilst travelling abroad.

Research expeditions will require the use of port agents in countries all over the world and NOC aims to only use reputable port agents when visiting foreign ports. A listing agent is used to ascertain which port agent is suitable for NOC needs and, whenever possible, NOC will use agencies from the Lloyds List of Shipping Agents. Where possible NOC undertakes a thorough, in-person formal Port Appraisal of port facilities by a senior member of the Research Ship Management Team if a port has not been visited by NOC or has not been visited for more than 5 years.



ACHIEVEMENTS

2022/23

- 99% of all purchases were made through the Procurement team.
- All NOC employees were provided with engagement training related to Modern Slavery & Human Trafficking and c.35% of employees directly attended engagement training that took place online.
- A news story was launched on the NOC intranet site highlighting the risks of Modern Slavery & Human Trafficking and the NOC's responsibilities towards prevention.
- NOC's supplier engagement programme has commenced and includes routine meetings with key suppliers, visiting trade shows and supplier sites, hosting supplier engagement activities and an increase in tendering. The intention is to continue and increase this activity into future financial years.
- The use of international suppliers used at NOC is actively being reduced where UK based alternatives are available and found to be appropriate for NOC needs. Within the 22/23 financial year international suppliers were reduced by c.25%.

COMMITMENTS

2023/24

- New online training is being launched so that all employees across the organisation will receive annual training on Modern Slavery & Human Trafficking as standard.
- Awareness campaigns will take place to include news stories being released on NOC's intranet and posters being displayed in key areas such as on the NOC ships.
- Creating a supplier engagement programme to include support to SME's and to meet the new procurement bill requirements.
- Review NOC's risk of links by using the UK Governments Modern Slavery Assessment Tool which was launched in early 2023.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for NOC (including in respect of its subsidiary National Oceanography Centre Innovations Limited) for the financial year ending 30th September 2023. It was approved by the NOC Board on the 9th November 2023.

JEREMY DARROCH
CHAIR, BOARD OF TRUSTEES
9TH NOVEMBER 2023

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