



# Anti-Slavery and Human Trafficking policy

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*All NOC Policies and Procedures apply to NOC Innovations unless otherwise stated.*

## Document Control

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**Policy Owner:** Associate Director (AD), Corporate Business Support (CBS)

**Updates:** The effectiveness of policies and procedures is monitored on an ongoing basis. This ensures that regulatory/legal change, incident occurrence and/or stakeholder engagement is considered and incorporated as the policy owner may deem necessary. Additionally, NOC's policy framework and procedure are subject to an effectiveness review every 3 years, records of which will be kept by the Legal & Governance Team. For further information please contact [NOC\\_governance@noc.ac.uk](mailto:NOC_governance@noc.ac.uk)

**Deletion Date:** When a policy is superseded or no longer required.

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## 1. Scope

This policy applies to all persons working for or on behalf of NOC in any capacity, including employees at all levels, trustees, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and business partners. It 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 human trafficking and should be read in conjunction with the policies on recruitment, procurement, anti-fraud, anti-bribery and corruption and whistleblowing.

## 2. Purpose

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

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 their freedom.

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 threat of a penalty and for which the person has not offered themselves voluntarily

'human trafficking' concerns arranging or facilitating the travel of another with a view to exploiting them.

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. References in this policy to "NOC" includes NOC the charity, as well as its trading subsidiary,

NOC Innovations Ltd.

The Modern Slavery Act 2015 details the penalties for those found guilty of an offence under Section 1 or 2 of the Act and includes imprisonment for life.

## Policy Statement

NOC is committed to the implementation and promotion of ethical business practices to protect staff from being abused and exploited and expects 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.

NOC contracting processes include as standard specific prohibitions on the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, throughout our direct supply chain. NOC is working to ensure that our suppliers hold their own suppliers to the same high standards.

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 to this effect, such as their annual Modern Slavery Statement. 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.

We may terminate our relationship with individuals and organisations working on our behalf if they breach this Policy. Where appropriate, we will also inform the police.

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

The **NOC Board** is accountable for ensuring NOC complies with the relevant legal and ethical obligations.

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 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 and investigation 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.

The **Head of Funding Assurance and Corporate Responsibility** is responsible for ensuring that project risk assessments include consideration of modern slavery risks in working with project

partners and suppliers.

The annual Modern Slavery Statement should include the following:

- NOC's structure, business and supply chains;
- note of policies in relation to anti-slavery and human trafficking measures;
- 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.

**Line managers** are responsible for ensuring those reporting to them understand and comply with this Policy.

## Reporting and Investigation of Concerns

You must ensure that you read, understand and comply with this Policy.

The prevention, detection and reporting of modern slavery in any part of NOC business or supply chains is the responsibility of all those working for NOC or under NOC's control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

All employees, if they consider there may be a risk of modern slavery anywhere within the business operations of NOC – whether directly or indirectly - are expected to raise this issue with their line manager immediately. If you do not feel comfortable doing so, you can speak to the Head of Legal and Governance and/or the COO. 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.

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.

Please refer to the Whistleblowing Procedure for further details of the processes NOC has in place to investigate any alleged instances of modern slavery/human trafficking.

The Head of Legal and Governance will maintain a record of all reports of modern slavery/human trafficking received and the result of any investigation. This information will be made available to the COO who will decide the appropriate course of action in each instance.

## Training

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

Breaches of this Policy by a NOC employee will be referred for action under the NOC Disciplinary Policy.

Any third party who breaches this policy may have their contract with NOC terminated with immediate effect.

#### 4. Monitoring and Evaluation

This policy will be monitored and its effectiveness evaluated through internal audit and compliance activity to be undertaken by the Legal and Governance team. The Board will provide oversight of this activity and one of the Directors will sign the annual statement.

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