

The logo consists of a white square with a black border, containing the text "National Oceanography Centre" in a black, sans-serif font.

National
Oceanography
Centre

The background is a photograph of a rugged coastline. In the foreground, dark, jagged rock formations frame a view of the ocean. Several tall, dark sea stacks rise from the water in the middle ground. The sky is overcast with grey clouds, and the water is a muted blue-grey color with some white foam from waves crashing against the rocks.

MODERN SLAVERY & HUMAN TRAFFICKING

STATEMENT 2024/25



The following statement outlines the action taken by the National Oceanography Centre (NOC) and its wholly owned subsidiary, NOC Innovations, to prevent modern slavery and human trafficking in its business activities and supply chains during the 2024/25 financial year. The statement intends to fulfil our corporate responsibilities in relation to the Modern Slavery Act 2015 and displays how we meet our corporate values and goals.

We are committed to understanding our blue planet. The ocean is the lifeblood of our world and yet so much remains undiscovered and its value overlooked. The science conducted here supports our mission to go deeper to gain knowledge of the ocean, to help every living thing on the planet flourish. Our four key focus areas are:

- **Climate**
Society can plan for, adapt to and mitigate against environmental change.
- **Biodiversity**
Marine biodiversity is protected and thrives.
- **Hazards and Pollution**
People, infrastructure and ecosystems are protected from hazards and pollution.
- **Sustainable Marine Economy**
The marine-based economy is sustainably developed whilst protecting the ocean's future health.

During the 2023/24 financial year, we have:

- Progressed our procurement strategy to meet the UK's new Procurement Bill.
- Reduced our supplier portfolio by c.14% enabling further control over supplier relationship.
- Continued to request that all suppliers sign up to our supplier Code of Conduct which reflects the requirements of the Modern Slavery Act. And where this isn't possible, asks for equivalent standards to be met.
- Displayed posters that provided key signs of Modern Slavery, and advice on what to do should you suspect someone is a victim.
- Train new starters on Governance arrangements including the Modern Slavery and Whistleblowing Policies and asked all staff to complete online training that included a module on Modern Slavery in the UK.
- Launched a new internal whistleblowing phoneline with an anonymous function available.
- Registered with the UK Governments Modern Slavery Assessment Tool in order that results can be used to make future improvements.

GOVERNANCE

We are now in our sixth year as an independent organisation and continue to be dedicated to delivering science, backed by robust governance arrangements.

These include set policies and procedures, routine training and engagement of all employees and various assurance activities that aim to achieve best practice.

Governance arrangements remain the responsibility of the Board. To support compliance, the Board have a Schedule of Delegated Authority which details responsibility and approval routes to ensure decisions are being made at the most appropriate level.

The Board are supported by a Committee Structure, including the Audit & Risk Committee which provide oversight of risk management and assurance activities for the organisation, the Executive Committee which provides senior oversight and decision making, including where ethical matters arise, and the Business Operations Committee which provides senior oversight of operational activity to ensure that areas of concern are having the attention required.

POLICIES AND KEY GUIDANCE DOCUMENTS

We have in place a suite of documents that are intended to guide staff in how they should work. These documents reflect legal requirements, regulation and our own strategy.

Our people policies include our Contracts of Employment which covers all human rights requirements, access to Trade Unions and how an employee can terminate their working contract. The Flexibility Policy outlines the opportunities available to staff to have flexible working arrangements. The Overtime Policy confirms overtime is allowable in exceptional circumstances, not considered normal working practice and will be compensated for either as paid or Time Off In Lieu (TOIL). The Equality, Diversity & Inclusion Policy outlines the importance of diversity at NOC, how every staff member should be treated fairly and with dignity, and the requirement to prevent all types of discrimination. The Grievance Policy outlines our expectation of staff behaviour and prohibits harassment, intimidation or any other type of inappropriate behaviour. The Seafarers Agreement is a requirement for any person boarding a research vessel as part of an expedition and confirms the rights of a person that align with the Maritime Labour Convention 2006.



Procurement Policies include the Supplier Code of Conduct which is compliant with the Modern Slavery Act 2015, and asks that sub-contractors adhere to similarly robust terms, that NOC are notified where links to Modern Slavery are identified, that an audit trail is in place and that prior or current convictions are declared.

Legal policies include the Anti-Slavery & Human Trafficking Policy which meets the requirements of the Modern Slavery Act 2015 including coverage of all types of modern slavery and human trafficking crimes and what to do if you suspect someone is a victim. The Safeguarding Policy intends to protect staff and visitors from inappropriate behaviour. The Conduct in NOC Facilities policy outlines the expectation of external visitors or partners in relation to how they should act when visiting our facilities. And the Whistleblowing Policy provides staff with a method to make a report of organisational wrongdoing without repercussions to themselves for making the report.

TRAINING

We aim to be a people first organisation and recognise that training is paramount to ensuring staff are equipped to do the job properly and efficiently. We provide routine training to all staff across the organisation including our Executive Team and Board. The training covers various compliance and risk-based topics one of which is awareness and prevention of Modern Slavery & Human Trafficking.

All new starters receive induction training that includes the coverage of the Modern Slavery and Whistleblowing Policies. In the 2023/24 financial year, 103 new starters commenced work, and all have been provided with the training. Additionally, key staff in the Legal & Governance Team complete bespoke training on this topic through the year that enables them to provide advice and design updated training as needed. The Procurement Team provide bespoke training in the form of workshops and online materials to all staff that cover how we can meet our procurement strategy which includes the eradication of modern slavery links in our supply chains.

SUPPLY CHAINS

Our supply chain is a vital component of how we work effectively and deliver on our objectives. This means we must be clear on our business practices; we will always pay a fair market price and in a reasonable time. Our standard terms for payment are 30 days from invoice and receipt of goods and on average pay invoices closer to 19 days.

NOC's sustainable procurement strategy includes 6 key objectives:

- Ensure prudent use of natural resources and reduction of waste in the supply chain,
- Support the management of our carbon impact,
- Seek out opportunities to increase supply from UK manufacturers and SMEs,
- Work with internal departments to embed sustainable procurement,
- Management of the delivery of goods and services through effective contracts, and
- Work with suppliers to implement ethical working practices and drive down modern slavery across the our supply chain.

The procurement team have reduced our supplier portfolio to 1,291 suppliers. Most suppliers are UK based with 10.5% EU suppliers and 8.4% rest of the world suppliers.

ASSESSING THE RISKS

Senior Management and the Audit & Risk Committee are responsible for reviewing and approving risk registers in order that risk is given the attention it needs. All staff are responsible for their own risk and should report where a risk becomes unmanageable.

Due diligence activities are a key area of how we manage risks and we complete some routine checks on all our suppliers and partners. This involves basic credit-based checks on a company or director for outstanding CCJs or convictions.

In relation to Modern Slavery, there are 3 main risk areas:

- Our supply chain risks are continuously being monitored and improvements are ongoing and included in our Sustainable Procurement Strategy detailed above.
- All employee contracts are subject to a successful right to work checks which are conducted for permanent and temporary roles. Any VISA requirements are monitored to ensure the required actions are taken before a VISA is due to expire. The Maritime Labour Convention is adhered to on our research vessels. Due diligence checks are undertaken on any recruitment agency to ensure they do not practice poor standards such as worker-paid recruitment fees.
- Our expeditions take staff all over the world with the ships docking at various port locations. We will only work with port agents from the Lloyds list of shipping agents. This is because they have been subjected to robust due diligence arrangements. Where possible, senior members of staff will inspect a port agent premises to ensure that standards are being met in terms of staff working conditions.

RAISING CONCERNS

Reporting a Modern Slavery or Human Trafficking concern is fundamental to ensuring that unknown control gaps and wrongdoing is corrected as soon as possible. There are multiple routes for staff to take, all of which are included as information in policies, online materials and training.

We encourage staff to voice any concern they may have over their own working conditions including general satisfaction related to NOC as an employer. In 2024, we procured an external organisation to conduct an anonymous people survey that would intend to gain an insight into our employee's thoughts of us as an employer. Results of the survey are reviewed by senior management and used to make enhancements to how we operate.

OUR COMMITMENT

As an international organisation, NOC has a higher risk profile related to modern slavery and human trafficking when conducting some activities. It is imperative that we act responsibly and ethically and do not compromise the wellbeing of others in order that we can achieve our goals quicker and cheaper. We take pride in working with others, supporting our local community, collaborating worldwide and all in the pursuit of ocean research.

During the 2024/25 financial year, we intend to:

- Provide NOC designed Modern Slavery Awareness training materials to NOC Innovation Centre Members, SME suppliers and PhD students.
- Continue to work with suppliers to sign up to and meet our Code of Conduct requirements.
- Use the results of the Modern Slavery Assessment Tool to guide where we can make improvements.
- Continue to raise awareness and train staff in order that risks can be identified and provide confidence in our operations, working with others and reporting.

APPROVAL

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 2024. It was approved by the NOC Board in October 2024.



JEREMY DARROCH
BOARD OF TRUSTEES CHAIR





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