

Modern Slavery Statement 2022-23

The National Oceanography Centre (NOC) seeks to understand the changing seas, upon which future human prosperity and wellbeing depend.

NOC is a charitable organisation limited by guarantee and established in 2018. As such, NOC is bound by the principles of the Charity Commission and will be transparent in all business conducted including the disclosure of any risks related to Modern Slavery. The Modern Slavery Policy broadly details the related risks and instructs an employee on what they should do if they suspect an instance of Modern Slavery. This policy is supported by the Whistleblowing Policy which guides an employee how to blow the whistle where they want to report wrongdoing by NOC and where other reporting options are not available to them.

NOC is governed by a Board of Trustees who are supported by various committees including a Risk & Audit Committee and an Ethics Committee. These two Committees are responsible for ensuring that NOC manage risk effectively and do not compromise the integrity of the charity by partnering with an organisation, or completing a research project that would not fulfil NOC's obligation to benefit the public or meet legal requirements.

NOC will face similar risks to other charities and research organisations on a day to day basis. However, as NOC collaborates and works both nationally and internationally, there are additional risks that must be considered and actioned accordingly. NOC takes very seriously the risk that Modern Slavery poses to its daily functions and is committed to establishing a business and supply-chain free from of Modern Slavery.

Risk Management is a major part of this and NOC have in place a robust Risk Management Framework that requires risk to be prioritised and discussed at the correct levels, that training is available to all staff, that open discussions take place and that risk mitigation is given adequate time and attention.

Currently NOC deals with a wide range of suppliers for products and services, some for general needs whilst others can be specific and specialised equipment for scientific research and innovation. In either case, NOC aims to put ahead of anything else, complying with the Modern Slavery Act 2015. As such, the procurement team are continuing to implement strategies and targets that support a Modern Slavery free supply-chain.

Due Diligence activity is undertaken across NOC where new partnerships are formed with other organisations or new suppliers. This process includes checking the Corruption Perception Index and UK Sanctions List as standard and further checks are made on a proportional basis. Appropriate due diligence is also included in NOC procedures for fundraising to ensure that donor organisations are assessed for links to Modern Slavery.

NOC is working hard to implement and develop strategies around the adherence of the Modern Slavery Act 2015. During the 2021-22 financial year we:

- Completed training for all new employees that includes coverage of Modern Slavery and NOC's commitment to meeting all requirements of the Act.
- We made sure processes were in place to have all goods and services paid for within 30 days of receipt and that creditors are checked monthly which avoids making financial demands of a supplier that may lead to violation of human rights due to late payments.
- We have a fair-market pricing structure which aims to ensure that we aren't making unreasonable demands or high-pressure deadlines which could also lead to human rights violations.



- The two research vessels have certifications of compliance under the Maritime Labour Convention which protects workers' rights and is awarded by the Maritime Coastguard Authority.
- All persons boarding the research vessels, including agency staff, must have a Seafarers Employment Agreement which affords a level of protection for human rights including access to food, water, accommodation, medical care and emergency repatriation.
- When visiting new foreign ports (or a port that has not been visited for some time), NOC will visit and assess the port for suitability of facilities and will only enlist reputable port agents through companies who verify and train all their agents.

NOC recognises there is more that can be done and is committed to making further improvements throughout the 2022-23 financial year and beyond. These will include:

Training – Being proactive is a valuable tool for the tackling of Modern Slavery and recognising common signs will inform employees of what to look out for. Additional and routine training, will be conducted along with awareness campaigns published on the Intranet and posted around the two NOC sites and on the research vessels. NOC's ambition is that the majority of employees will complete Modern Slavery Awareness training within the 2022-23 financial year.

Supply-Chain Management – The Procurement team have established a new strategy designed to improve relationships with key suppliers. As part of the new strategy, Procurement will also be making visits to key supplier manufacturing sites to gain first-hand experience of their working environments. This will enhance NOC awareness of supply chains and provide comfort that we only deal with those compliant with the Modern Slavery Act 2015. Plans are also in place to reduce the number of international suppliers with local ones and be more aware of where materials originate.

Purchasing controls – The Procurement team are developing relationships within the organisation so they are more effectively able to support all purchases. Processes are being arranged so that procurement are involved in all NOC purchases in at least an advisory capacity and that all suppliers used are appropriately vetted before use. As a measure of this target, NOC aim to have the majority of all purchases conducted through the Procurement Team during 2022-23 financial year.

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 30 September 2022. It was approved by the NOC Board on 9th February 2023.

A handwritten signature in black ink, appearing to read 'Jeremy Darroch'.

Signed: Jeremy Darroch
Chair, Board of Trustees
9 February 2023