



# Modern Day Slavery Statement

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Statement review date: December 2023

Statement created by: Darren M. Wilson – Director NPML

**Modern Slavery Statement:** Slavery and Human Trafficking Statement for the period 01<sup>st</sup> January 2021 to 31<sup>st</sup> December 2023

## **1. Introduction**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as 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.

Nocton Park Management Limited [NPML] has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by NPML during the year ending 31st December 2020 to prevent modern slavery and human trafficking in its business units and supply chains.

NPML and associates are all committed to ensuring there is transparency throughout the business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

## **2. Organisation**

NPML is a totally not for profit organisation that provides looks after the management of the Nocton Park estate in Nocton Lincolnshire. It has the responsibility for maintaining the grounds and roads of Nocton Park estate on behalf of its residences and is run, on a voluntary basis, by its residents.

## **3. To Whom this statement applies**

This policy applies to all persons working for NPML or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. This statement does not currently form part of any employee's contract of employment but NPML reserves the right to amend it at any time.

## **4. Our supply chains**

NPML seeks excellence in every area of the work it carries out and strives to ensure the highest standards of professionalism, integrity and ethical business practice. We are committed to conducting our business in a lawful manner and this includes

engaging with our suppliers to ensure that they share our high standards.

NPML has the propensity to procure a wide range of external goods and services, including construction services and supplies, external furniture, cleaning services, printing, waste and recycling services and do so in accordance with procurement law. NPML reserves the right to but is not limited to procure through frameworks established by collaborative consortia.

We expect our suppliers to fulfil their obligations to comply with the provisions of the Modern Slavery Act. Modern Slavery and Human Trafficking are included within our new supplier risk assessment and due diligence procedures. We will continue to build upon our existing systems to identify, assess and monitor potential risk in our supply chains. NPML reserves the right to exclude any bidder, contractor or service-provider who has been convicted of an offence under the Modern Slavery Act 2015.

## **5. Responsibility for the policy**

The Nocton Park Management Limited Board has overall responsibility for ensuring this policy and have day to day responsibility to ensure compliance with our legal and ethical obligation.

Any director going out to tender or getting quotes to fulfill the due diligence requirements of NPML have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Any director that has a direct report, be it sub-contractors or volunteers, has a responsibility for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it, should it be required, and the issue of modern slavery in supply chains.

## **6. Compliance with this policy**

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

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

You must notify a Director as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the NPML or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify a Director as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with any Director within NPML.

We aim 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. NPML is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of NPML 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 a director immediately. If the matter is not remedied, and you are a director, an employee, a volunteer or a sub-contractor, you should raise it formally with Wilkin Chapman LLP (who are acting as legal representation for NPML).

## **7. Training and policies**

NPML reminds all employees and volunteers on an annual basis of the values included within its Code of Conduct and receives acknowledgement of the Code from its freelancers, consultants and suppliers. Our directors and associated support staff are trained to ensure, through our recruitment checks, that we do not employ people who are under-age or who do not have the right to work in the UK. Our contracts adhere to the European Working Time Directive.

NPML operates a Whistleblowing Policy, aimed principally at our employees but also available to our suppliers, which encourages the reporting of any wrongdoing which extends to human rights violations like Modern Slavery. All reports will be fully investigated and appropriate remedial action taken. NPML's Anti-Corruption and Bribery Policy reinforces the principles of ethical working practices.

Additional training on this policy, and on the risk our Trust faces from modern slavery in its supply chains, will be provided as and when necessary outside of the normal period and for any new staff joining NPML.

NPML's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## **8. Further steps**

During the course of the coming years, up to December 2023, NPML will seek to develop:

- Effective communications with our suppliers to confirm their understanding and compliance in line with our expectations. All new supplier forms will include a modern slavery and human trafficking clause for the suppliers confirmation prior to NPML using them as a supplier.
- A centralised procurement policy shall be initiated for Board approval which will include modern slavery and human trafficking information as part of the approved tender process.

- The inclusion of modern slavery and human trafficking clauses within our standard terms and conditions.
- Specific training on modern slavery risks for all groups of staff to ensure that any potential risks are identified and mitigated.

### **9. Breaches of this policy**

Any employee (direct or indirect) who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

NPML will terminate our relationship with immediate effect with other individuals and organisations working on our behalf if they are found to be in breach of this policy.

### **10. Governance**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Trust's slavery and human trafficking statement for the financial year ending 31<sup>st</sup> August 2020.

Signed

Chair of the Board

Date:

Signed

Witness Director

Date: