

Newburn Power Rental Quality Manual	Policy POL 160004	Page 1 of 7
Section: <b>Slavery and Human Trafficking</b>	Subject Title: Slavery and Human Trafficking Statement and Policy	
Prepared by: C E Bright	Original Date: 25 <sup>th</sup> April 2016	
Issued by: C E Bright	Revision Date: 12 <sup>th</sup> April 2018	
Approved by: M Henstock	Annual Review Date: 12 <sup>th</sup> April 2019	

**Policy:**

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. We have 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.

**Purpose:**

We are also committed to ensuring there is transparency in our own 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.

This policy applies to all persons working for us or on our 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 policy does not form part of any employee's contract of employment and we may amend it at any time.

**Responsibility:**

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Carole Bright has 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.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to Carole Bright

Signed: ...CE Bright..... Carole Bright  
Director

Date: .....12<sup>th</sup> April 2018.....

## **Key Elements:**

### INTRODUCTION FROM THE BOARD OF DIRECTORS

We are committed to improving our practices to combat slavery and human trafficking. We undertake all reasonable and practical steps to ensure the health, welfare and safety of all our employees and all employees within our supply chain. This includes office and warehouse inspections and audits to ensure our standards are being implemented throughout the businesses of our suppliers and that local legislation and regulations are complied with. We will address any non-compliance on a case-by-case basis and will then tailor remedial action appropriately. We will only trade with those who fully comply with this policy or those who are taking verifiable steps towards compliance.

### ORGANISATION'S STRUCTURE

Newburn Power Rental Limited (NPR) provides power products from its locations throughout England. It has a Head Office in South Kirkby and three other depot locations, employing between 35 and 45 people. Our products are sourced from a broad range of national and European suppliers. The supplier relationships are sourced and managed by our directors in the UK.

We have an annual turnover of £2 million GBP.

### OUR BUSINESS

Our business is organised into four business units: generator hire; generator sales; generator service and maintenance and temporary electrics.

### OUR SUPPLY CHAINS

Our supply chains include: Atlas Copco, SDMO, CAT Finning, Inmesol, Western Environmental, SES Entertainment, Watson Fuels, Tate Fuels, Edmondson's, Elland Cables and Electric Warehouse.

### OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

The company has identified the following compelling reasons to establish a comprehensive system of Minimum Labour Standards to guide it in its business operations.

- **ETHICAL RESPONSIBILITIES** – the Company acknowledges its obligations towards its customers, employees and the communities in which it works arising from its business operations and wishes to work and trade in an ethical fashion.
- **THREAT TO SECURITY OF SUPPLY** – Newburn Power Rental Limited has identified that labour standards abuses in supply chains can pose a risk to the security of supply. Any supply chain partners perpetrating abuses face legal enforcement action, which may damage business and interfere with their ability to continue to supply.
- **ADVERSE PUBLICITY AND DAMAGE TO NPR REPUTATION** – adverse publicity from the discovery of labour standards abuses in the company's supply chain presents reputational and structural risks as follows
  - (a) **Income** – customers may choose to purchase supplies and services from other providers
  - (b) **Staff recruitment and retention** – staff may choose not to work for a company associated with any labour standards abuses and this may lead to poor morale in the work place and difficulty in recruitment
  - (c) **Loss of trust** – both with customers and suppliers and also within the wider community
- **REDUCED QUALITY OF GOODS AND SERVICES** – NPR recognizes that there is commonly a link between poor labour standards and poor quality of goods and services. To this end, it is in the interests of the company to ensure its suppliers reach minimum labour standard targets at all times.

These minimum labour standards are: -

- **Child labour** – NPR does not engage in or support the use of child labour. If NPR engages young workers (e.g. on work experience), it will ensure that a suitable risk assessment is carried out and that young persons are not exposed to any hazardous conditions, or in the case work more than 8 hours per day.
- **Forced and compulsory labour** – NPR shall not engage in or support the use of forced or compulsory labour, or bonded or involuntary prison labour. Employees are free to leave upon reasonable notice.
- **Health & Safety** – NPR shall provide a safe and healthy workplace environment and shall take effective steps to prevent potential accidents and injury to employees' health by minimizing, so far as reasonably practicable, and in cooperation with its employees, the causes of hazards inherent in the workplace. All employees will receive safety and job specific instructions during the course of their employment with the company. Employees shall have access to clean sanitary facilities and drinking water. Responsibility for implement the Health & Safety element of this policy is assigned to the Health & Safety Manager.
- **Freedom of Association** – the freedom of association is respected and NPR will comply with UK labour relations legislation in this regard.

- Discrimination – NPR shall not engage in or support any discriminatory practices in hiring, remuneration, access to training, promotion, termination or retirement based on race, national or social origin, caste, religion, gender, sexual orientation, political affiliations, age or other conditions that could give rise to discrimination. NPR has an Equal Opportunities and Diversity Policy that is shown to all new employees at induction.
- Disciplinary Practices – NPR shall treat all employees with dignity and respect. NPR shall not tolerate the use of corporal punishment, mental or physical coercion or verbal abuse of personnel. No harsh or inhumane treatment is allowed.
- Working Hours – NPR shall comply with applicable laws and industry standards on working hours and holiday entitlements. NPR's normal working hours do not exceed 48 hours per week, and overtime hours do not exceed 12 hours per week. NPR ensures all employees have the legal right to work in the UK.
- Remuneration – NPR shall comply with national laws and regulations with regard to wages and benefits. All work related activities are carried out based on a recognized employment relationship established according to national law and practice.

## DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we ensure compliance with relevant legal and other requirements to which we subscribe. We ensure all our key suppliers are aware of this policy and make available sufficient resources for the implementation of our policy.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains
- Protect whistle blowers

## SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values and ethics we have in place a rigorous supply chain compliance programme. This consists of all new suppliers completing a pre-qualification questionnaire and providing supporting information related to their policies and procedures, ensuring they have full compliance with all relevant legislations. This information is then assessed by our compliance team and requires regular updates and reviews. We have a dedicated compliance team, which consists of involvement from the following departments:

- Legal, audit and compliance
- Health & Safety
- Human resources
- Procurement
- Sales

## OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Health & Safety statistics, including number of reportable injuries and near misses
- Staff turnover
- Policies and procedures

## COMPLIANCE WITH THE 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 our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy
- You must Carole Bright 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 our business 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 your manager as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains
- 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 your manager or Carole Bright
- 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. We are 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 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 Carole Bright immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found at Section E, Internal Procedures of the Employee Handbook.

**COMMUNICATION AND AWARENESS OF THIS POLICY**

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our 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.

**BREACHES OF THIS POLICY**

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

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

**FURTHER STEPS**

Following a review of the effectiveness of the steps, we have taken this year to ensure that here is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Ensure all our suppliers have complied with our qualifications
- Provide a programme of review for all our suppliers
- Comply with all regulations and legislation ourselves

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending November 2016.

**Related Documents:**

Document name	Document code