



NENE VALLEY
FIRE & ACOUSTIC LTD.

Modern Slavery Statement

Nene Valley Fire & Acoustic Ltd
Unit 11 Leyland Trading Estate,
Irthlingborough Road,
Wellingborough, NN8 1RS

Reviewed By:	Elisabeth Barnard	Version No:	November 2020
Director Endorsement:	David Tyrrell	Date of validation:	30/11/2020

1. Definitions

1.1 “Modern slavery” is a term which covers slavery (where ownership is exercised over a person); servitude (which involves the obligation to provide services imposed by coercion); forced or compulsory labour (which involves work or service exacted from any person under the menace of a penalty and for which the person has not offered himself voluntarily); and human trafficking (which concerns arranging or facilitating the travel of another with a view to exploiting them, even where the person consents to the travel).

1.2 We will ensure that we will comply with the Modern Slavery Act 2015 and are putting strict measures in place to ensure that modern slavery is not part of any of our business operations. This includes our supply chains, goods and services. This statement sets out the steps we are taking to continually develop our procedures and to check our compliance.

1.3 This statement covers our financial year ending June 2021.

2. Overview

2.1 Our business was established in 1986 and is still privately owned. Since our inception, we have been engaged in all areas of Passive Fire Protection, Insulation, and Acoustic Works. We have completed extensive projects in diverse sectors such as Industrial, Borough & County Council, Housing Associations, Retail, Commercial, Brewery, Hospitals, Laboratories, Aviation, Prisons, Schools (Private and Comprehensive), Colleges, Universities, leisure projects, Botanical Gardens and government buildings.

2.2 We employ between 50 -100 staff at any one time and do not use agency or temporary labour within the business. Our sub-contract base is extremely small and only consists of UK-based specialists with whom we have a long working relationship.

2.3 We source all our equipment and materials from UK based suppliers with whom we have longstanding relationships and with whom we have shared values regarding integrity and transparency with regards to ensuring modern slavery does not take place within our supply chain. We work closely with our main suppliers and customers; with our employees and their representatives to ensure the highest level of compliance with relevant ethical trading schemes (such as FSC/PEFC).

2.4 We have BRE Global accredited technicians and are a BRE Global accredited company, including CHAS, LPCB, SAFE CONTRACTOR, and CONSTRUCTION LINE accreditation.

3. Responsibilities

3.1 The Managing Director has responsibility within the business for our anti-slavery initiatives, including the writing and implementation of policies, risk assessments, investigations, due diligence and training.

3.2 The Operations Director is responsible for overseeing our efforts to help to eliminate modern slavery and for monitoring progress against the commitments contained in this document.

3.3 The Finance Director and Administrator are responsible for ensuring that all recruitment and terms and conditions of employment comply with statutory requirements.

3.4 Managers are responsible for upholding our “core values” and for ensuring that employees who work for them also behave in accordance with these.

3.5 Our finance and administration team is responsible for ensuring that appropriate checks are made prior to placing any orders with new suppliers, and that existing key suppliers are audited from time to time to ensure continued compliance.

3.6 Our Managing Director and Operations Director work with our major customers to provide them with appropriate information on our modern slavery initiatives and to gain suggestions and feedback.

4. Recruitment

4.1 Our recruitment and selection policy aim to assist all those involved in the recruitment process to comply with equal opportunity. All new employees are recruited directly and Right to work checks are conducted prior to joining. We check with all new recruits that they have not been required to pay any fees to gain work with us and inform them of the procedures that should be followed should they wish to leave our employment.

4.2 In addition, we check that their passports have not been withheld and that they have not been required to sign any agreements with any third parties in respect of our offer of employment.

5. Supply Chain

5.1 We acknowledge that the most significant modern slavery risks are in our supply chains where manufacturing of certain products takes place out of our sight and sometimes overseas. We only use reputable UK-based suppliers of both niche fire protection materials and general construction equipment, tools and materials.

5.2 We embrace socially responsible trading and wherever possible we use Fairtrade ingredients.

5.3 Our main suppliers are requested to inform us of the steps that they are taking to eliminate modern slavery.

5.4 Our subcontractors are also requested to inform us of the steps that they are taking to eliminate modern slavery.

5.5 Our subcontractor pre-qualification questionnaire is under review to ensure it specifies a requirement for an effective Modern Slavery Statement and strategy.

6. Training

6.1 We will provide suitable training for all employees to ensure that they are aware of this Statement and can be vigilant in identifying and reporting any concerns they have.

6.2 Our training extends to an e-learning programme, toolbox talks and site briefings. Modern Slavery is also discussed in periodic Company Health and Safety meetings.

7. Communicating This Statement and Concerns

- 7.1 All of our employees, workers and subcontractors will be made aware of this statement and a copy is available on the shared drive.
- 7.2 A copy of this statement will also be given to all relevant bodies and Customers with whom we work.
- 7.3 Any concerns about the assignment or people involved should be addressed with a manager or the Managing Director.

8. Penalties for Breach

- 8.1 If a supplier or subcontractor is found to be involved in any form of modern slavery, its contract will be terminated either immediately or on its due renewal date, depending on the severity of the breach. We may also report any suspicions of criminal activity to the police.
- 8.2 If it is established that any employee has acted in breach of any of our policies, or is aware of, has condoned or failed to report any suspicion of modern slavery within our business or supply chains, they will be subject to our disciplinary procedure.

9. Related Policies and Documents

9.1 Whilst the company does not have a specific policy for Modern Slavery, the following company policies serve to address the risk of modern slavery within our own business and our supply chain:

- Business Ethics and Integrity Policy
- Disciplinary Policy
- Equal Opportunity Policy
- Safeguarding Policy
- Whistleblowing Policy

The above list is not exhaustive.

10. Monitoring and Review

- 10.1 The Managing Director will monitor and review this statement and strategy on an annual basis, or at an earlier opportunity should the need arise. The information gained via completed report forms and feedback from relevant external bodies will also form the basis for any necessary changes in company policies or procedures.
- 10.2 Employees' compliance with this statement will be measured via the training matrix, one to ones and our annual appraisal system.
- 10.3 This Statement is to be reviewed at least annually by the Managing Director and Directors however will be reviewed at any time following changes such as:
- Changes to processes or staff

- Following incident investigations both within the organisation and where lessons have been learned from others
- Following consultation with employees' representatives and Customers
- On receipt of new relevant information from manufacturers, regulators, industry experts or other sources of information relevant to the organisations undertakings

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Signed:

Managing Director: David Tyrrell