

# International Nuclear Services LTD Modern Slavery Statement 2019/2020



## Introduction

The Modern Slavery Act 2015 is an Act of Parliament of the UK. It is designed to combat Modern Slavery in the UK.

INS is in full support of the act and recognises that INS and its extended supply chain have an important role to play in tackling these crimes.

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or supply chain. This statement sets out our position on modern day slavery, how we are currently addressing our risk and our objectives for the next financial year.

## Who are we?

INS is a wholly owned subsidiary of the Nuclear Decommissioning Authority (NDA), which is an executive non-departmental public body sponsored by the Department of Business Energy and Industry Strategy (BEIS). Its business relates to irradiated fuel management and nuclear material transportation.

INS operates two 100% owned subsidiaries, INS France and INS Japan. It also owns a 68.75% share of Pacific Nuclear Transport Limited (PNTL), other shareholders being Orano (12.5%) and a consortium of Japanese Nuclear Utilities (18.75%).

PNTL carries out the maritime transport of nuclear cargoes and its fleet of ships is managed by Serco Limited.

Our subsidiaries do not meet the turnover threshold to publish separate annual

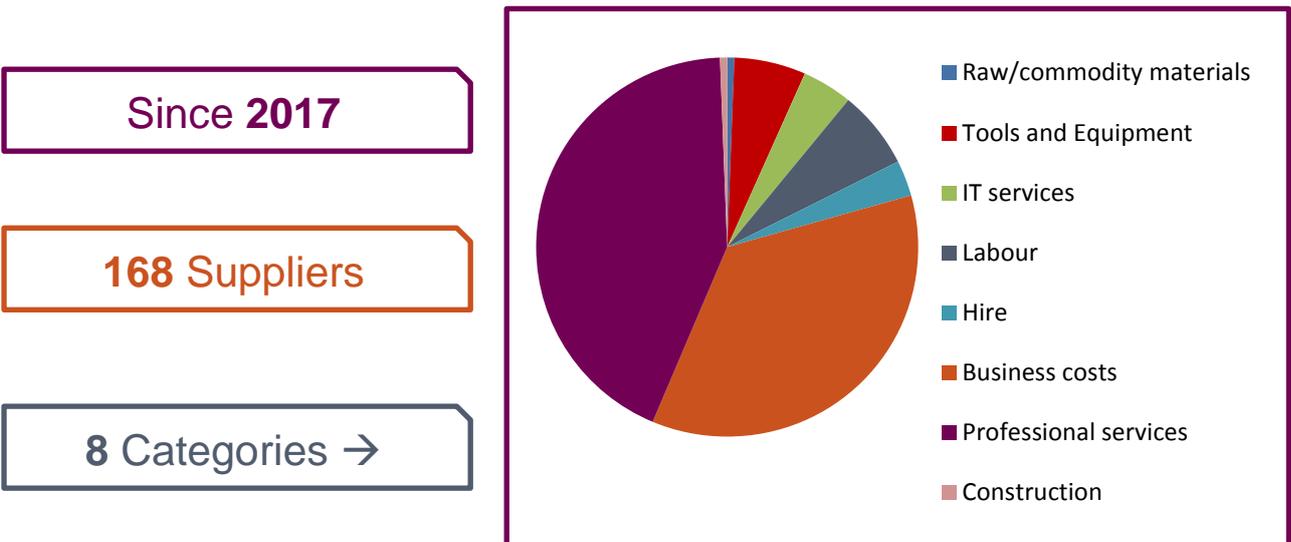
statements under the Act and are included within this INS statement.

For more information about INS or PNTL please access the INS and PNTL website on [www.innuserv.com](http://www.innuserv.com) and [www.pntl.co.uk](http://www.pntl.co.uk).



## Our Supply Chain

A big part of our work is in support of NDA's strategy. This involves the transportation of spent fuels and the return of waste to countries of origin. We operate Pacific Nuclear Transport Limited (PNTL), the world's most experienced nuclear shipping company who have a fleet of three INF3 nuclear transport carriers. INS contracts with the supply chain for the goods and services it needs to complete these shipments and other business objectives. INS has used 168 suppliers since 2017. This number reflects a range of suppliers from one off small value orders to longer existing contracts and collaborative frameworks.



## Addressing our Risk

During the last financial year, INS has not identified any evidence of Modern Day Slavery occurring within INS or our supply chain. Whilst we recognise that slavery can exist in any supply chain, we are content that our suppliers work, in the main, in low risk areas and are upholding our values, and the standards expected of the Act.

Many of our routine purchases of consumable goods are made through Crown Commercial Services Framework contracts and government-procured supply chains. Our procurement activities take place in England and our contractors and suppliers are predominantly UK and EU-based with some suppliers based in Japan.

INS continues to try to understand and address our risk in the following ways:

### Supply Chain Assessment

INS has undertaken a high level but risk focused due diligence on our direct suppliers, giving consideration to the geographical nature of the suppliers and the type of product and services supplied. INS continues to assess new suppliers in this manner. Assurance and site visits are arranged on a case by case basis in line with this assessment.

**INS carried out five assurance visits in the last financial year, including to all of our suppliers in Japan.**

## **Our Employees**

Before colleagues start working with us, we use pre-employment checks to confirm their identity and right to work in the UK. Information is provided to all employees on their statutory rights by virtue of their employment.

**135** INS Staff

**177** PNTL Seafarers

Where recruitment agencies are used, we ensure they comply with all legal requirements. These procedures collectively help to address our ongoing commitment to eliminate all forms of forced and compulsory labour.

## **Collaboration with Key Stakeholders**

To ensure all those in our supply chain and contractors similarly comply with our values, we continue to be a part of the NDA Supply Chain Charter, which can be found on our website. This reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing appropriate and effective systems and controls. The Supply Chain Charter includes compliance with the Modern Slavery Act 2015.

## **Educating Ourselves**

We have ensured our approach follows emerging best practice by assessing and interpreting recent and emerging case law. We have benchmarked the activities we have undertaken against similar public and private organisations and have acted on the lessons learned.

## **Policies**

Policies supporting our approach to modern slavery include our Procurement Policies and our Whistleblowing Policy, which are published on our intranet.

If there are any concerns relating to modern slavery or human trafficking they can be raised in confidence and without fear in accordance with our whistleblowing procedure.

We also have a confidential and independent reporting helpline operated by an independent company, Safecall, which specialises in handling concerns at work. Once a complaint has been made to Safecall, it will be forwarded to a nominated senior employee within INS who will decide how it is to be investigated. Any concerns will be fully investigated.

## Our Tender Documents

We have inserted clauses into our standard terms and conditions requiring suppliers to comply with the anti-slavery legislation and we expect our supply chain to do the same.

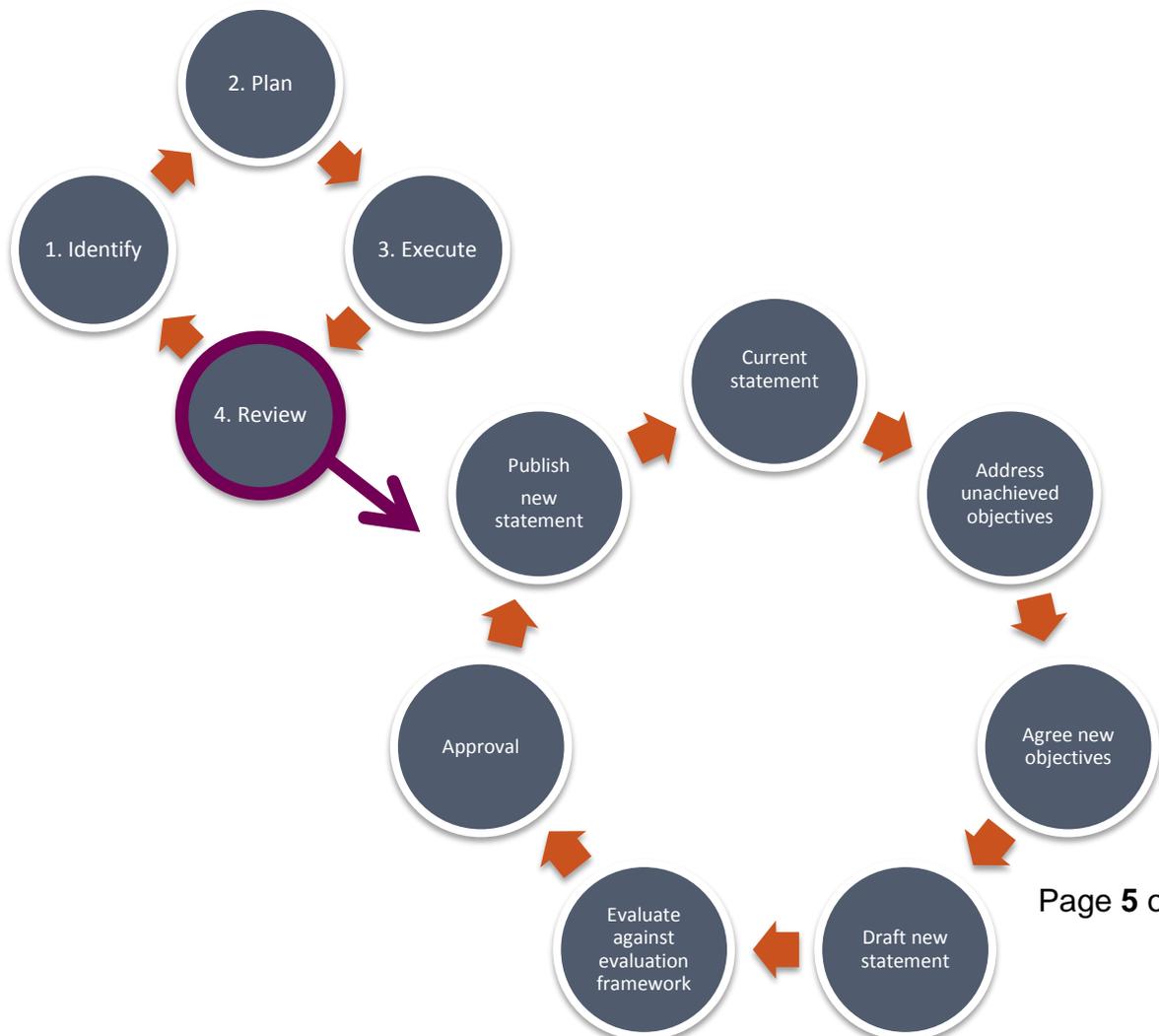
Our tender documentation includes the mandatory exclusion (subject to self-cleaning provisions) of any bidder who has been convicted of an offence under the Modern Slavery Act 2015.

Accountability continues to be assigned to INS Finance and People Director with a cross-functional team including assurance, procurement, legal and supply chain experts undertaking day-to-day management of suppliers.

## Evaluation

INS has developed a modern slavery statement evaluation framework; a tool to assess the quality of our modern slavery statements and drive improvement in our statements over time. By tailoring our statements over time, we can focus on the risks that our company faces. The evaluation matrix is structured against the six recommended areas of content taken from the statutory guidance for 'Slavery and Human Trafficking in Supply Chains: Guidance for Businesses.'

The process for writing our annual statement is illustrated below.



## Next Steps

- 1. Reporting** - INS will continue to produce an annual statement to disclose the steps we are taking to ensure that slavery and trafficking is not taking place within INS or in any of our immediate supply chain companies.
- 2. Modern Slavery Champion** - INS will nominate a Modern Slavery Champion to monitor our risk and drive improvement in this area.
- 3. Training** - Modern slavery can be difficult to identify. To help INS identify the signs, we will roll out training for new procurement staff and refresher training for key managers within INS.
- 4. Modern Slavery Policy** - INS will develop a Modern Slavery Policy which will include additional information on our approach to modern slavery and will be available on our website.
- 5. Supplier Questionnaire** - INS will, for those suppliers bidding to provide services classed as high risk of having slavery present, implement a modern slavery questionnaire to help us to understand who our suppliers are and learn from their own experiences.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes INS's slavery and human trafficking statement for the financial year ending 31 March 2020.

**Alaine Greaves**



Finance and People Director  
for International Nuclear Services Ltd.  
Date: September 2019