Newgrove Limited

Modern Slavery Policy

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Newgrove Limited. Company No: 02775618, VAT No: GB 666 2978 82
Registered at Cardiff. Registered Office: 4th Floor, One Kingdom Street, Paddington Central, London W2 6BD
POL-012 Modern Slavery Policy V2.0 – Client-shareable

Version History

Version	Date	Author	Change	Approved by
1.0	November 2019		Original issue; approved as issued	
2.0	2026-10-18	Information Security Team	Full refresh of the November 2019 policy; changes recorded in the policy's change log	Chief Technical Officer

Document Control

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Approved by:	Chief Technical Officer
Approval date:	2026-10-18
Effective date:	2026-10-18
Next review date:	2027-09-30
Owner:	Chief Executive Officer
Scope:	The policy covers Newgrove's own workforce (employees, contractors and consultants) and its suppliers. Staff based outside the UK are also protected by the law of the country where they work.
Review and consultation process:	Drafted or reviewed by the Information Security Team and approved by the Chief Technical Officer (PRC-001). Full review each September and an interim check each March, and after any decision, incident, legal change, client requirement or audit finding that affects it.
Distribution methods:	The controlled master is held in the compliance repository (git) maintained by the Information Security Team, with the approved text tagged by version. Released copies are published to SharePoint. Staff and clients receive exported PDF/DOCX copies of approved documents only; clients receive only documents classified public or client-shareable (PRC-001).
Associated documentation:	POL-001 Information Security Policy POL-011 Anti-Bribery and Corruption Policy POL-013 Procurement Policy PRC-009 Joiners, Movers and Leavers, and Access Reviews PRC-011 Supplier and Sub-processor Management POL-007 Staff Handbook
Supersedes:	SRC-0008 Newgrove - Modern Slavery Policy November 2019 (Word)
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1. Purpose

Modern slavery covers slavery, servitude, forced or compulsory labour and human trafficking. Newgrove has a zero-tolerance approach to modern slavery in its own business and in its supply chain.

Newgrove's turnover (about £1 million) is well below the £36 million threshold for section 54 of the Modern Slavery Act 2015, set by the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015, reg. 2. So it is not required to publish a slavery and human trafficking statement. It adopts this policy because it is committed to running an ethical business, and because its clients expect it.

2. Scope

The policy covers Newgrove's own workforce (employees, contractors and consultants) and its suppliers. Staff based outside the UK are also protected by the law of the country where they work.

3. Policy statements

Risk

3.1 Newgrove's own operations are low risk. It is a small professional software business whose staff work remotely, all under written terms.

3.2 Its main suppliers are established cloud and software providers (supplier register), which are also low risk. Higher risk could arise from hardware supply chains, or from any outsourced labour Newgrove might use in future.

Own workforce

3.3 Everyone Newgrove employs has their identity checked before starting. Anyone who will work for Newgrove in the UK, including workers and individual contractors engaged directly (from 1 October 2026, when the Border Security, Asylum and Immigration Act 2025 extended right-to-work checks beyond employees), has their right to work checked before starting, by one of the Home Office methods: a manual check of original documents, a Home Office online check using a share code, or a registered digital verification service provider (Information Security Policy §5.3; Staff Handbook §34; Joiners, Movers and Leavers, and Access Reviews procedure). Everyone working for Newgrove:

- has clear written terms
- is paid directly (employees into their own bank account; contractors against invoice)
- is free to leave on giving the agreed notice

Newgrove never keeps anyone's original identity documents (it keeps only the copies the law requires for right-to-work checks) and never charges recruitment fees.

Suppliers

3.4 Suppliers are expected to meet the standards in the Procurement Policy. Those standards include no forced, bonded or child labour, and respect for the ILO Declaration on Fundamental Principles and Rights at Work.

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3.5 Where a supplier is higher risk, the supplier review under the Supplier and Sub-processor Management procedure asks about its approach to modern slavery. Newgrove will work with a supplier to address concerns, and will stop using any supplier found to tolerate modern slavery.

Awareness and reporting

3.6 Staff are made aware of this policy at induction. Anyone who suspects modern slavery in Newgrove's business or supply chain reports it to the Chief Executive Officer, or, if it involves the Chief Executive Officer, to the Chief Technical Officer, as described in section 5 of the Anti-Bribery and Corruption Policy. They may also call the Modern Slavery and Exploitation Helpline (08000 121 700). In an emergency they call 999.

3.7 Newgrove investigates every concern and takes appropriate action, including reporting to the authorities.

4. Roles and responsibilities

Role	Responsibility
Chief Executive Officer	Owns this policy, investigates concerns, and decides on action with suppliers
Everyone	Follows this policy and reports concerns

5. Compliance, monitoring and exceptions

Reviewed in full each September, with an interim check each March. The September review is done alongside the supplier register. If Newgrove's turnover ever approaches the statutory threshold, a slavery and human trafficking statement will be prepared, approved by the board of directors and signed by a director, as the Modern Slavery Act 2015 s.54(6) requires; this policy itself is approved by the Chief Technical Officer.

6. Related documents

- Procurement Policy; Supplier and Sub-processor Management
- Anti-Bribery and Corruption Policy (raising concerns)
- Joiners, Movers and Leavers, and Access Reviews (right-to-work checks)

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