



NTIA

Modern Slavery Policy
United Kingdom

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The Night Time Industries Association
Modern Slavery Policy United Kingdom

This policy can be issued to employees to explain the Night Time Industries Association (NTIA)'s stance on modern slavery.

This document should be completed after reading the document Modern Slavery – General Information.

Modern Slavery Statement

A) ORGANISATION

This statement applies to all companies within and associated with **The Night Time Industries Association (“NTIA”)** (*referred to in this statement as ‘The Organisation’*). The information included in the statement refers to the financial year 2024-2025.

B) ORGANISATIONAL STRUCTURE

The Night Time Industries Association (NTIA) operates under a centralised business structure, overseen by a Board of Directors. While there is one central office registered at Grove House, 2 Woodberry Grove, London, N12 0DR, our operations span various regions in the United Kingdom.

Our main activities include advocating for and supporting the night time economy, and representing diverse venues, including nightclubs, bars, music venues, restaurants, hotels, festivals and events.

Our efforts are not limited by seasonality, as we work tirelessly throughout the year to champion the interests of our members and ensure the vitality of the nighttime economy. The labour supporting NTIA's operations is primarily carried out within the United Kingdom, encompassing various regions where our initiatives and advocacy efforts are implemented.

C) DEFINITIONS

The Organisation considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or having restrictions placed on freedom of movement.

D) COMMITMENT

The Organisation acknowledges its responsibilities in tackling modern slavery and is committed to complying with the provisions of the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices about its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its services is obtained using slavery or human trafficking. The Organisation strictly adheres to the minimum standards required about its responsibilities under relevant employment legislation in England, Scotland, Wales and Ireland, and in many cases exceeds those minimums for its employees.

E) SUPPLY CHAINS

The Night Time Industries Association (NTIA) operates within a diverse and multi-faceted supply chain. Our first-tier suppliers often consist of intermediary traders, who in turn maintain contractual relationships with lower-tier suppliers. This structure adds a layer of complexity to our supply chain, requiring careful management and coordination to ensure smooth operations and the fulfilment of our objectives.

In addition, NTIA has established agreements with trade unions regarding bargaining terms and conditions. These agreements define the bargaining units to which they apply, outlining the scope and parameters of our engagement with labour representatives. This collaborative approach ensures that the interests of both our organization and our workforce are effectively addressed, fostering a harmonious and productive working environment.

F) POTENTIAL EXPOSURE

The Night Time Industries Association acknowledges that its primary exposure to the risk of slavery and human trafficking primarily exists within its supply chains, particularly in areas where protection against breaches of human rights may be limited. This risk is most pronounced in sectors involving labour-intensive processes or in regions where regulatory oversight may be less stringent.

Overall, the Association views its exposure to slavery and human trafficking as relatively high due to the nature of its operations and the complexity of its supply chains. Nonetheless, the Association remains committed to combating these practices and ensuring that they do not occur within its business operations or within any organisation that supplies goods and services to it.

To address this risk, the Association has implemented robust measures to prevent and detect instances of slavery and human trafficking within its supply chains. These measures include conducting thorough due diligence on suppliers, assessing the labour practices of key partners, and implementing policies and procedures to uphold human rights standards. Additionally, the Association actively collaborates with industry partners, government agencies, and civil society organisations to share best practices and strengthen collective efforts to combat modern slavery and human trafficking in all its forms.

G) IMPACT OF COVID-19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for the Organisation, as it did for others across the nation.

The Organisation concludes that the COVID-19 pandemic did not adjust the risk of modern slavery to a level above that which existed before the pandemic, as set out under 'POTENTIAL EXPOSURE' above. Its use of suppliers dropped significantly because homeworking was swiftly implemented in March 2020 which meant that its premises, from which it usually conducts day-to-day business, were temporarily closed. Several of our workforce were placed on furlough as a result of the drop in demand for our services, meaning there were no additional temporary labour needs.

During the pandemic, the Group's employees still had access to the grievance procedure to raise any concerns that they may have had.

In line with emergency legislation passed by the Government, Group employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree to a temporary period of homeworking. The Organisation decided from the outset of the pandemic to ensure that all of the workforce who were required to self-isolate following public health guidelines continued to receive full pay during their absence.

The Organisation's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

H) STEPS

The Organisation carries out due diligence processes to ensure slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

Following section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- Periodic reviewing of supplier contracts to include termination powers if the supplier is, or is suspected, to be involved in modern slavery.

I) KEY PERFORMANCE INDICATORS

The Night Time Industries Association has established key performance indicators (KPIs) to evaluate and measure its effectiveness in preventing and addressing modern slavery within the organisation and its supply chains. These KPIs serve as benchmarks to assess the impact of our initiatives and the success of our efforts in combating modern slavery.

Some of the key performance indicators established by the Association include:

- **Supplier Audits:** Conduct regular audits and assessments of suppliers to evaluate their compliance with anti-slavery policies and regulations.
- **Training and Awareness:** Monitoring the participation and effectiveness of training programs aimed at raising awareness among employees and suppliers about modern slavery risks and prevention measures.
- **Incident Reporting:** Tracking and analysing reports of suspected instances of modern slavery or human trafficking within the organisation or its supply chains, and assessing the timeliness and effectiveness of response mechanisms.
- **Continuous Improvement:** Monitoring progress over time identifying areas for improvement in anti-slavery policies, procedures, and practices, and implementing measures to enhance effectiveness and responsiveness.

By regularly monitoring and evaluating these key performance indicators, the Night Time Industries Association aims to ensure continuous improvement in its efforts to combat modern slavery and uphold human rights across its operations and supply chains.

J) POLICIES

The Organisation has the following policies which further define its stance on modern slavery:

- Modern Slavery Policy
- Supplier Code of Conduct
- Recruitment Policy

K) TRAINING

The Organisation provides modern slavery awareness training to staff and members to effectively implement its stance on modern slavery.

L) SLAVERY COMPLIANCE OFFICER

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action about the Organisation's obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval *26th February 2024*

Signed.....
Director of Operations

Date *1st March 2024*