



PICTON CASTLE CHARITABLE TRUST

Modern Slavery Statement

This statement applies to Picton Castle Charitable Trust (PCCT). The information included in the statement refers to the financial year 2025.

1. Organisational structure

PCCT is a charitable incorporated organisation. Its operations are confined to Picton Castle, The Rhos, Haverfordwest, Pembrokeshire. Its work is exclusively concerned with promoting its charitable objects. These are, for the public benefit;

- a) The preservation of Picton Castle, the chattels and collections within Picton Castle and the surrounding gardens which are of national, scenic, historic, architectural, aesthetic, scientific or artistic interest or importance;
- b) The advancement of education in the arts, culture and heritage; and
- c) The provision of facilities for recreation and other leisure-time occupation in the interests of social welfare with the object of improving the conditions of life for the persons for whom they are intended.

PCCT is governed by a Board of Trustees whose work concentrates on strategic development. The day-to-day operational management of historic site, the staff and visitors is delegated to the charity's CEO (Director).

The labour supplied to the PCCT in pursuance of its operation is carried out in Picton Castle Gardens, Pembrokeshire. The work of PCCT is wholly carried out inside Wales, United Kingdom.

2. Definitions

The PCCT 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 of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

3. Commitment

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

The PCCT 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 PCCT in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The PCCT strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

4. Supply chains

In order to fulfil its activities, the PCCT main supply chains include those related to maintenance of historic houses and gardens. This supply chain tends to be simplistic, UK based and is often regional/local for suppliers for services. We understand that PCCT first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

5. Potential exposure

The PCCT considers its main exposure to the risk of slavery and human trafficking to exist in the supply of raw materials for building repairs (such as wood), if the lower-tier suppliers source it from a country where protection against breaches of human rights may be limited.

In general, the PCCT considers its exposure to slavery/human trafficking to be relatively limited but it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

6. Steps

The PCCT carries out due diligence processes in relation to ensuring 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 PCCT has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the PCCT has ensured that modern slavery is not taking place by:

- Reviewing supplier contracts to include termination powers, in the event that the supplier is, or is suspected, to be involved in modern slavery.

7. Training

The PCCT provides the following training to staff to effectively implement its stance on modern slavery online course on Modern Slavery, through our third-party HR support.

8. Slavery compliance officer

The PCCT has a Slavery Compliance Officer, the Director, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the PCCT 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.