

NCG Modern Slavery and Human Trafficking Statement

2025/2026 looking towards 2026/2027

Introduction

This statement sets out NCG's actions and commitment to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking either within its own business or supply chains.

NCG acknowledges its responsibility under the Modern Slavery Act 2015 ("the Act") and will ensure transparency is achieved within the organisation so the objectives of the Act are achieved on a consistent basis.

The below sets out practices already in place at NCG and any committed actions set for 2026/27.

Our Organisation

NCG is one of the largest educational, training and employability organisations in the UK, managing seven Colleges nationally and serving over 40,000 learners and customers annually. The group has its head office in the UK and has an annual turnover of circa £187m.

NCG value and empower our people by:

- Being both **inclusive** and **diverse**
- **Trusting** and **respecting** our communities
- Taking **ownership** whilst working **collaboratively**
- Inspiring **excellence** and **curiosity**.

NCG have an effective range of suppliers who deliver a wide diversity of products and services to enable our front-line and on-line services to take place.

We believe in procuring and working with like-minded suppliers who share our mission, vision, and values. We value the people we engage with throughout our supply chain to assist the delivery of our vital work and at the right quality standards. We believe that by working together we can add value and innovation to our mission and also generate ethical and economic public expenditure, which impacts positively on communities and the environment.

Our Policy on Slavery and Human Trafficking

NCG is committed to acquiring goods and services without causing harm to others. NCG will make reasonable endeavours to ensure all employees and agents within our supply chains are not subject to any form of human trafficking or forced / compulsory / bonded labour, and that they are paid as a minimum the applicable national minimum wage in that country.

All colleagues have a personal responsibility for the successful prevention of slavery and human trafficking, with the Group Procurement team taking responsibility for overall compliance of Group suppliers. This statement and associated documentation will be reviewed annually, prior to NCG publishing its annual audit Financial Statements (incorporating the Modern Slavery Act 2015 requirements).

The following NCG Policies and Procedures support the organisation's compliance with the Act:

- Recruitment Policy
- Equality, Diversity, and Inclusion Policy
- Whistleblowing and Disclosure Policy
- NCG Code of Conduct for Suppliers and Subcontractors

Our Supply Chains

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

To date, we have reviewed our supply chain and identified general areas of global risk that could potentially harbour Modern Slavery. These areas include:

High NCG Spend with Higher Risk Globally

- Electronics, computers, telecommunications and related equipment procured from international manufacturers.
- Furniture and fit-out products.
- Food (e.g. rice, sugar, cocoa, fruit, and vegetables).

Lower NCG Spend with Higher Risk Globally

- Garments (e.g. PPE, workwear, sportswear, theatre costumes).
- Low value, ad hoc purchases via credit card.
- Purchases made via online marketplaces (e.g. Amazon marketplace and similar platforms).
- General course, laboratory and construction materials.
- Office equipment and consumables.

High NCG Spend with Lower Risk Globally (i.e. UK-based Suppliers)

- Recruitment and Sub-Contracted Labour (UK).
- Construction.
- Cleaning, security and facilities management services.
- Catering services.

General Principles used at NCG for Mitigating Against Risk

- To be aware of any Modern Slavery risk in the pre-procurement stages of particularly high spend procurements.
- To use compliant Frameworks where possible in order to better control Modern Slavery via the Selection Criteria on Frameworks – this ensures that suppliers adhere to the Modern Slavery Act and can be disqualified for breaches.

- All NCG Tenders and Dynamic Purchasing Systems (DPS) incorporate the same approach via the mandatory Cabinet Office Procurement Specific Questionnaire for all procurements over £177,897 (NCG tender threshold).
- When procuring high-risk high-value categories suppliers must adopt and comply with the NCG Code of Conduct for Suppliers and Subcontractors or provide an acceptable alternative policy, which incorporates requirements under the Modern Slavery Act 2015.
- To openly discuss approaches to Modern Slavery and Corporate Social Responsibility (CSR) with suppliers prior to contract signature (e.g. in presentations and final meetings).
- Encourage all construction related suppliers to work towards a recognised accreditation such as Construction Line Gold, CHAS or equivalent, which has the added benefit of compliance with the Modern Slavery Act 2015.
- 100% of our existing suppliers adhere to the NCG Code of Conduct for Suppliers and Contractors or to a similar standard shown in their Code of Conduct and or related policies.
- 100% of new suppliers agree to comply with the NCG Code of Conduct for Suppliers and Contractors as part of onboarding.

A Review Over the Last Year

Over the last year NCG have taken steps to tackle Modern Slavery. These include:

- NCG have remained an accredited Real Living Wage Employer, which means all NCG employees and regularly contracted staff working for providers of outsourced services are paid at least the Real Living Wage. This is now a mandatory requirement in all procurements for services.
- Checks of Modern Slavery Statements have been assessed where spend is high and risk could occur (e.g. as a result of company take overs), and where Modern Slavery policies may be weaker or non-existent.
- Procurement have continued to encourage low price, higher risk new goods where the supply chain is less manageable for NCG (e.g. for purchases of clothes and electronics) to be purchased via preferred or pre-checked Suppliers where possible.
- Procurement have carried out an annual review of supplier accounts and closed any un-used accounts to cap the supplier base to increase transparency and to control risk including Modern Slavery.
- A review of the new recruitment agency arrangements, which has resulted in a significant reduction in the number of agencies we work with to improve control of this higher risk spend category. TSR have strong compliance around standardised employment checks with the agencies they use.

Future Plans

NCG expresses its commitment to better understand its supply chains and working towards greater transparency and responsibility towards people working on them.

Adequate resources will be made available to ensure slavery and human trafficking is not taking place within our organisation or within our supply chains to the best of our knowledge.

NCG strive to continuously improve our programmes of education to enable social mobility and economic prosperity in civic society.

The NCG Group Executive Board take responsibility and accountability for implementing this statement and our next steps:

- To continue to assess higher risk areas and ask suppliers their approach to Modern Slavery.
- Further to the Code of Conduct for Suppliers and Subcontractors being incorporated into our standard T&C's for procuring goods and services, when contracts are in preparation for renewal, we will incorporate 'Modern Slavery' into NCG Contracts provisions.
- We will continue to review Modern Slavery Statements for high spend supplies (e.g. when a company takeover occurs).
- When onboarding smaller SME's and VCSE suppliers we will, where needed, guide them in understanding Modern Slavery by providing best practice guides and encouraging voluntary policies.
- We will ensure that 100% of NCG employees who have roles dealing with suppliers and recruitment, such as the Procurement Team, receive ongoing updates and notifications regarding business & human rights, and specifically Modern Slavery. This will enable us to review best practice approaches to Modern Slavery annually.
- Wider training for general NCG staff on procurement and the prevention of Modern Slavery is available on the procurement training module but will also be included where possible on any wider induction for staff.
- We will continue to review and consolidate suppliers on to public frameworks (where this makes best sense for NCG) in order to control risk and review approach annually.
- We will continue to stop purchases from online suppliers for high-risk items where the source of the item is unclear – as although prices may be low, it does not provide adequate protection against modern slavery (e.g. Electronic Goods via third-party selling sites).
- Apply due diligence to ensure business supply chains are slavery-free, and to protect against child labour, forced labour, human trafficking, gross human rights violations, or other health and safety risks to workers.
- Adhere to and flow down any Procurement Policy Notes (PPN) to any NCG approved subcontractors within our supply chain, whereby NCG has applied PPN to the goods and services provided by the Supplier to NCG.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

Liz Bromley

Chief Executive

Approved by Corporation Board on 15 September 2026.