



NCG Modern Slavery and Human Trafficking Statement 2019/2020, looking towards 2020/2021

Introduction

This statement sets out NCG's actions 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 in its own business, and its supply chains.

NCG is committed to driving out acts of modern slavery and human trafficking from within its own business and 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 information shown below sets out practices already in place at NCG and any committed actions set for 2020/2021 in response to the introduction of the Modern Slavery Act in 2015.

Our Organisation

NCG is one of the largest educational, training and employability organisations in the UK. The group has its head office in the UK has an annual turnover circa £130m. It serves over 40,000 learners and customers annually.

Our Policy on Slavery and Human Trafficking

NCG is committed to acquiring goods and services for its use 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 forced, compulsory / bonded labour or human trafficking and that they are paid in line with the national minimum wage.

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. The Head of Group Contracts and Procurement will report annually to NCG Corporation on compliance with the Act from a procurement perspective. 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 Strategy.
- Disclosure Policy.
- NCG Code of Conduct for Suppliers and Contractors.

Our Supply Chains

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

To date we have reviewed our supply chain and identified general potential areas of risk including:

- Recruitment.
- Security Services.
- Food & Catering Services.
- Construction.
- Cleaning.
- Stationary and Office Equipment.
- Clothing (work wear).
- General Course Materials, software and equipment procured from international manufacturers.

When procuring goods, works and services in the higher risk categories, NCG ensures that suppliers are required to prove a high level of corporate social responsibility during the tendering and selection process and the Group Procurement team utilises the mandatory Crown Commercial Services ("CCS") Selection Questionnaire for all procurements over £100k (NCG tender threshold).

2019/20 Update

The NCG Code of Conduct for Suppliers and Contractors was reviewed and approved by Governors in June 2020 and mandates all suppliers and their subcontractors to comply with the Act. In addition, the Code of Conduct mandates suppliers and subcontractors to comply with other business related legislation relating to tax, employment, health and safety, wellbeing and safeguarding.

Furthermore, the Dynamic Purchasing System for subcontractors of training has been updated to include questions relating to the Modern Slavery Act 2015.

The Code of Conduct for suppliers and subcontractors has been incorporated in to our standard terms and conditions for goods and services.

All construction related suppliers must hold or be working towards Construction Line Gold membership to ensure compliance with the Modern Slavery Act 2015.

Our Plans for the Future

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:

- For higher risk areas such as high volume spend with one supplier who may procure overseas to continue to ask suppliers approach to Modern Slavery within company and the supply chain.
- Continue to review and consolidate suppliers onto public frameworks or into single suppliers via NCG tenders to have greater control on suppliers and review approach annually.
- Discourage purchases from online suppliers where the source of the item is unclear as although prices may be cheap it does not provide adequate protect against modern slavery e.g. ebay.
- Apply due diligence to ensure business supply chains are slavery free to protect against child labour, forced labour and 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.
- Enhance reference to modern slavery in training for staff who are purchasing or liaising with suppliers can be aware of this issue.

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