



NCS Modern Slavery Statement

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Version Control

NCS Trust is committed to the continuous improvement of its service offerings and underpinning policies and procedures. It will review the functionality of this policy and related procedures on an annual basis unless an incident warrants it being reviewed sooner or if there is new legislation or guidance that must be taken into account.

Version	Date	Author and job title	Date of approval and by whom	Next review due and by whom	Comments (changes applied)
1.0	May 2017	Debra Cook, Safeguarding Manager	n/a	October 2018, Debra Cook	Introduction of procedure
2.0	September 2018	Debra Cook, Safeguarding Manager	November 2018	September 2019, Debra Cook	Update of statement evidencing the Trust's commitment to ensuring that there is no slavery, servitude, forced or compulsory labour or abuse of power with NCS and the supply chains. Evidence of systems to ensure Modern Slavery is not taking place within our network partner supply chains. Evidence of robust recruitment systems and Disclosure and Barring Service (DBS) checking
3.0	September 2019	Debra Cook, Safeguarding Manager	Amanda Best (COO), September 2019	Amanda Best (COO), September 2020	Recognition of new forms of exploitation that are defined within the modern slavery field Recognition that a child under 18 is unable to consent to any form of slavery

4.0	September 2020	Debra Cook	SLT, September 2019 (not approved) - required additional procurement and HR content)	Michael Devlin, Director of Governance and Delivery / NCS Trust Board, December 2020	Update of Statement to address extra recruitment risks due to COVID-19 and evidence of how these risks are being mitigated
5.0	December 2020	Debra Cook, Safeguarding Manager / James Woods, Head of Compliance & QA / Lynn Carter-Smith, Head of Procurement / Lara Olufon, People Business Partner / Clare Boston, Head of Contract Management / Kerry Viner, Senior Legal Counsel	Michael Devlin, Director of Governance and Delivery / NCS Trust Board, 3 December 2020	Michael Devlin, Director of Governance and Delivery / NCS Trust Board, December 2021	Expansion of document to include additional context on supply chain structure, nature of services, due diligence and processes for preventing occurrence of modern slavery at the Trust and throughout our supply chain

Modern Slavery Statement

The National Citizen Service Trust (the Trust) welcomes the introduction of the [Modern Slavery Act 2015](#) (the MSA) and is committed to acting both ethically and with integrity both internally and throughout our supply chains. We expect the highest of standards in both areas and equally, we expect that all other business partners and suppliers will do the same.

The Trust is committed to ensuring that there is no slavery, servitude, forced or compulsory human labour, abuse of power over vulnerable individuals, human trafficking or any other form of exploitation as contemplated by the MSA in any part of the organisation or the network.

The Trust welcomes transparency as encouraged by the MSA and this statement sets out for the public, our stakeholders, suppliers and employees the steps we are taking in this regard.

This statement sets out the steps the Trust has taken during the 2019-2020 financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business. It also looks to the future and identifies areas where improvements are planned for the current financial year.

Definitions of modern slavery

Modern slavery encompasses many different types of behaviours and abuse, perpetrated against individuals from any background and of any age. Modern slavery is abuse and therefore is included in the Trust's Safeguarding Policy and Procedures.

The different types of abuse that come under the umbrella term of modern slavery are:

- Slavery, servitude and forced or compulsory labour (s.1 MSA)
- Human trafficking (s.2 MSA) (the purposeful movement of a person for exploitation in whatever form. There is no minimum or maximum distance (i.e. it can be from one room to another)
- Organised crime, forced street crime, cannabis and other narcotic cultivation and production

Exploitation can include (in addition to the above):

- Sexual exploitation (i.e. forced into prostitution, regardless of age of the individual being exploited)
- Removal of organs

- Securing services by force, threats or deception (in particular if the individual being exploited is a child or an adult at risk). This can also include an individual being forced into committing criminal acts against their will as a possible debt-bondage process

Child sexual exploitation is a named type of abuse in its own right. This is the specific targeting of children (anyone under the age of eighteen) in order to exploit them sexually. Typically this occurs with gangs of perpetrators, who may use drugs, alcohol and/or gifts to groom the child. It is important to note that with all cases of child sexual exploitation, a child is unable to consent to their own abuse.

Labour abuse and labour exploitation

Labour abuse is at the lower end of the modern slavery spectrum but can be equally traumatising for the individual concerned. Issues such as non-payment of minimum wage, lack of personal protective equipment (PPE), few or no breaks, belittling of workers and long hours are all signs of labour abuse.

Forced labour and labour exploitation are at the higher end of the spectrum and defined as modern slavery. They involve the control, force or coercion of an individual to perform work.

This is serious and high harm, and signs include restrictions on movement, debt-bondage, removal of identity documents, psychological manipulation and threats of, or actual violence.

Indicators of modern slavery include:

- Individuals not being paid for the work they undertake
- Individuals being held in debt-bondage (being told they “still” owe money after having paid off a previous debt)
- An individual’s passport being held by their “employer” in order to keep the individual at work
- Multiple benefit claimants having their benefits being paid into the same account
- An individual not having freedom of movement (i.e. Passport being taken)
- Clear exploitation of an individual by another for financial or sexual gain

Our policies in relation to modern slavery

As an equal opportunities employer, the Trust is committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. The Trust wants all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

To ensure that the Trust recruits and treats employees fairly and eliminate any possibility of modern slavery, our human resources (HR) policies set out our procedures on how we:

- Recruit and select employees in a fair, lawful and professional manner, both for internal and external candidates.
- Treat all employees fairly during their employment and, if there is an occasion when an employee does not feel that they have been treated fairly, there are procedures in place to raise a grievance or involve a local trade union, where they exist, or where this is a legal requirement to do so.
- Manage the exit of an employee from the business in a fair and consistent manner.

The Trust realises that spotting the signs of modern slavery is not always easy. Victims are often fearful of their controllers and may try to hide their situation due to fear of retribution against themselves, friends or family. Trust staff need to be aware of behavioural and physical signs that victims show.

The policies below, as well as others such as Disciplinary and Conduct, and our Grievance Policy, support us in ensuring that modern slavery is not taking place in our supply chains or our business.

[Code of Conduct](#)

Refreshed in May 2020, describes what we must do and how we must behave to ensure we have the trust of all our stakeholders. It details how we will create better outcomes in the right way, not at any cost, in line with our purpose and values.

[Whistle Blowing Policy](#)

Sets out our commitments to speaking up about serious concerns detailing how any person working at or with the Trust, including those employed in our supply chain, can raise concerns or 'whistleblow' and the channels available to do so confidentially, responsibly and effectively and without fear of repercussions.

[Diversity and Inclusion Policy](#)

Ensures that we foster a fair and inclusive workplace, where our people are valued, their differences are respected, and discrimination

Structure of NCS programme delivery and supply chains

The Trust is the chartered commissioning body for NCS, which comprises a network of organisations delivering youth programmes and activities to young people from the United Kingdom aged primarily 16-17 years of age, but with scope in some cases to expand this to 15-24 years. The role of the Trust is to set standards for performance and effectively manage this supply chain of network partners to deliver high quality youth activities against those defined standards.

The Trust's head office is based in London, with further regional offices being based in Newcastle and Exeter. A central contact centre run by the Trust in conjunction with a third-party service provider also operates from the Newcastle office building.

The Trust's supply chain of network partners consists of nine distinct regions, overseen by Tier 1 suppliers who are termed Management Partners (MPs), each with their own Tier 2 suppliers termed Delivery Partners (DPs) sitting below them. The Trust itself oversees three of those regions directly, contracting directly with the Delivery Partners in those localities. In some cases, Delivery Partners will have Tier 3 suppliers that are contracted to support them with their NCS delivery.

In addition to suppliers who provide and support the delivery of the NCS Programme, the Trust's supply chain includes suppliers who provide a range of goods and services across many spend categories e.g marketing, technology, HR services, research, FM, consumables, travel and accommodation.

The total spend with all suppliers for FY 2019-20 (01/04/2019-31/03/2020) was £135,257,000 annual spend with 85% of this spend with 17 strategic suppliers.

The Trust's procurement activities are subject to the Public Contracts Regulations 2015.

The Trust's procurement, finance and contract management teams work together to ensure that payments are made to suppliers in line with their contractual terms, and are reflective of the actual services delivered.

Due diligence processes in relation to slavery and human trafficking

When procuring goods and services we generally require suppliers to sign up to the Trust's own contractual Terms and Conditions which require suppliers to comply with all applicable laws including the MSA.

Under the Public Contracts Regulations 2015, procurement regulations have been amended to make certain modern slavery offences such as child labour and human trafficking, grounds for mandatory exclusion of bidders from public procurement.

In 2021 the Trust, when undertaking new procurement activities which come under the Public Contracts Regulations 2015, will include questions on Social Value. These questions will be supported by an explanatory narrative which will make direct reference to staff rights and the MSA.

The Trust is registered as a buyer with the Gov.uk Modern Slavery Assessment Tool (MSAT) and will support the Trust in driving campaigns to invite suppliers to

complete the MSAT within the platform. The MSAT is a modern slavery risk identification and management tool. This tool has been designed to help public sector organisations work in partnership with suppliers to improve protections and reduce the risk of exploitation of workers in their supply chains. It also aims to help public sector organisations understand where there may be risks of modern slavery in the supply chains of goods and services they have procured. All Public sector organisations are encouraged to use the MSAT with existing suppliers.

Suppliers who have a turnover of £36M or more and carry out all or part of their business in the UK, must publish a Modern Slavery Statement on their web sites and update annually and be approved by their board and signed by a director and be easily accessible on the suppliers home page on their web site. The Trust will seek evidence of these statements and will consider subscribing to open data platforms or monitoring services to support due diligence.

The Trust will formulate a set of relevant key performance indicators, being measures that will assist the reader of this Statement to assess the effectiveness of activities described in the statement.

As the Statement will be produced annually, performance indicators will be useful in demonstrating progress from one year to the next

Each year the Trust commissions independent pre-delivery readiness assessments of all Management Partners (including the Trust itself) to ensure that the supplier and its supply chains are being managed effectively and that planned NCS programmes will be delivered professionally and safely to all service users.

Part of this process involves undertaking an assessment of Management Partners' (and a sample of their Delivery Partners) approach to preventing and addressing instances of modern slavery. This process includes the review of modern slavery policies and processes, and their application in the delivery of NCS services. Any non-compliance to expected standards is immediately flagged to the relevant partner and the Trust by the independent assessor. The Trust will then take appropriate action to ensure that the issue is fully resolved, will not reoccur in the future, and may in some circumstances take further action with respect to the contract held with the supplier.

Directly contracted Management Partners and Delivery Partners are required to (i) have a safeguarding lead who is up to date with all safeguarding legislation, including the Modern Slavery Act 2015; and (ii) comply with minimum policy requirements, which includes requiring them to have a Modern Slavery Policy.

Risk assessment and management

The Trust has zero tolerance for risks associated with modern slavery and is committed to the consistent implementation of reporting tools and mechanisms in order to ensure that risks of this nature are monitored, mitigated and escalated effectively.

Whilst risks associated with modern slavery can be identified by anyone within the Trust or our supply chain, it is critical that we ensure that the management of these risks is delegated to the right people, with sufficient level of responsibility and oversight. We do this by utilising our risk framework and policy in order to ensure that risks are escalated to the appropriate level within the organisation and communicated externally where necessary.

Effective action taken to address modern slavery

At the point of employee recruitment and in accordance with relevant laws, appropriate checks are carried out on prospective Trust employees. The Trust's People Team works closely with the relevant teams in the directly run regions to make sure that salary, contractual terms and benefits are appropriately managed.

In accordance with the Trust's commitment to acting ethically and with integrity in all business relationships, the Trust seeks to implement effective systems and controls to ensure Modern Slavery is not taking place in our supply chain. This involves ensuring the effective communication and reinforcement of our modern slavery statement and associated policies and documentation, which give a clear view of the values and principles that underpin all the Trust's work and must be adhered to by our suppliers.

These policies comprise of the NCS Safeguarding Policy and Procedures, NCS Programme Delivery Personnel Code of Conduct, Safer Recruitment Guidance (produced in conjunction with the NSPCC) and the NCS Diversity and Inclusion Policy for Programme.

The NCS whistleblowing line (details of which are available on the NCS website) is accessible to all, and ensures that there is a direct reporting system for any concerns relating to modern slavery. Extra training will be available to all Management and Delivery Partner personnel who have direct responsibility for recruitment in order to mitigate risk (included any additional risks to employment terms generated by COVID-19 implications).

The Trust acknowledges that there has been increasing recognition of forms of exploitation that fall under the umbrella term of modern slavery, such as child exploitation by county lines drugs gangs. Furthermore that a child under-18 years of age is not able to consent to any form of modern slavery.

In the context of the rapidly changing landscape brought on by COVID-19, the Trust is aware that in all business, new or increased risks exist in relation to modern slavery, and that the furloughing of some staff within our partner network has the potential to compromise recruitment practices. Moreover, the Trust understands that the Disclosure and Barring Service (DBS) - which serves as a resource for preventing underage recruitment - has experienced delays and resulted in alternative methodologies for processing applicants.

To mitigate these risks, the Trust has audited the safer recruitment procedures of all of Delivery Partners and is in the process of procuring bespoke safer recruitment training to be facilitated by an external training provider organisation. This will help to ensure that Network Partner suppliers are aware of their obligations to ensure that robust measures continue to be in place and applied appropriately. Training will be available to all new partner suppliers and will be provided specifically to those identified as needing additional guidance.

The Trust has taken measures during the DBS process to ensure that all Network Partners can evidence that DBS checks have been undertaken for all staff. This is in the form of all partners supplying the unique DBS reference number and expiry date for all employees. DBS checks only being available for people 18 years old and over, ensures that no children are employed by the Trust and equally by our partners.

The Trust will report any instances of modern slavery identified either internally or throughout our network to the Department for Digital, Culture, Media and Sport. Reporting will be accompanied by details of planned or implemented remedial actions and preventative measures taken to prevent recurrence.

Training on modern slavery and trafficking

The Trust will ensure that training is available to all personnel within the organisation in relation to modern slavery. This will ensure that all those working at the Trust have a clear understanding of what modern slavery entails, how to identify instances of modern slavery, and how to appropriately escalate concerns.

The Trust will seek to provide training to network partners in the form of commissioned training, webinars and documented guidance. The Trust recognises that although all of our partners employ safer recruitment practices, several of our partners have been unable to articulate these during recent audits. Subsequently, these providers will undertake training facilitated by Trust and / or third party contractors, as outlined above.

Modern slavery concerns relating to service users (Programme attendees - young people primarily 16 -17 year olds)

The Trust has a clear reporting procedure for any modern slavery concerns highlighted within the organisation or by network partners:

1. Concern is identified: this could be that a service user is a victim or perpetrator, or a service user informs us of a concern they have
2. NCS Programme personnel discusses this with their line manager (where appropriate) and the Trust's Director of Governance and Delivery immediately

NOTE: If an individual is, or group of people are, in immediate risk of danger or harm, the police must be immediately notified on 999.

According to the nature of the concern, the Trust's Director of Governance and Delivery will lead on the next actions that are to be taken. This will be on a case-to-case basis. Next steps could include:

- Notifying the police
- Contacting the Modern Slavery helpline (0800 0121 700)
- With the individual's consent, completing a referral to the National Referral Mechanism (NRM) (national framework for identifying potential victim of human trafficking and modern slavery and providing appropriate care) (England and Wales/Scotland/Northern Ireland)
- Referral to an external agency

Any identified concerns connected to modern slavery will be shared with the Chief Executive and the Trust's Legal Counsel.

Modern slavery concerns connected to a Network Partners of third-party contractor

If there are any identified concerns about any network partner or their supplier tiers regarding the possible occurrence of modern slavery, the following actions must be taken:

- 1) Concern is identified within the supply chain or in relation to a third-party contracted directly by the Trust: suppliers are required to inform the Trust's Director of Governance and Delivery of the concern. If the concern is raised directly with the Trust by an individual or employee of a supplier/third-party contracting with the Trust, then the recipient of the report must inform the Trust's Director of Governance and Delivery accordingly

2) The Trust's Director of Governance and Delivery will take appropriate action, which will require the involvement of and escalation to other personnel at the Trust

NOTE: If an individual is, or group of people are, in immediate risk of danger or harm, the police must be immediately notified on 999*.

For concerns emanating from within the Network Partners and their supply tiers, the Management Partner will lead on next actions that are to be taken. This will be on a case-to-case basis. Next steps should include:

- Notifying the police
- Contacting the Modern Slavery helpline (0800 0121 700)
- With the individual's consent, completing a referral to the National Referral Mechanism (NRM) (national framework for identifying potential victim of human trafficking and modern slavery and providing appropriate care) (England and Wales/Scotland/Northern Ireland)
- Referral to an external agency
- Undertaking an investigation into the safeguarding of service users while participating in activities with the relevant supply chain partner
- Suspending the contract with the relevant supply chain partner whilst an investigation is conducted

Any identified concerns connected to Modern Slavery will be shared with the Chief Executive and the Trust's Legal Counsel.

NOTE: Where a supplier has been identified as engaging in practices amounting to modern slavery, a discussion will be had as to the Trust's future relationship with the relevant supplier to ensure appropriate action has been taken.

Contact details for reporting modern slavery concerns at the Trust

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