



NCG Modern Slavery and Human Trafficking Statement 2021/2022 looking towards 2022/2023

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 2022/23.

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 £130m.

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, Inclusion & Belonging Strategy.
- Whistleblowing and 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 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, and equipment procured from international manufacturers.
- 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 price goods (e.g. Credit Card expenditure outside Frameworks through third-party retailers such as Amazon).
- General course and construction materials.
- Office equipment.

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

- Recruitment and Sub-Contracted Labour (UK).
- Construction.

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 System (DPS) incorporate the same approach via the mandatory Crown Commercial Services (CCS) Selection Questionnaire for all procurements over £100,000 (NCG tender threshold).
 - When procuring high-risk high-value categories suppliers must adopt and comply with the NCG Supplier Code of Conduct 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 (CRS) with suppliers prior to contract signature (e.g. in presentations and final meetings).
 - Encourage all construction related suppliers to work towards Construction Line Gold with 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.
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A Review Over The Last Year

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

- NCG have become 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.
- Carried out a scoping exercise with a view to hosting our own Supplier events to educate our supply chain on topics like Modern Slavery.
- Supported the Digital Poverty Challenge by approaching members of our Supply Chain for contributions.
- NCG Procurement have been particularly alert to a changing global market and fluctuating prices both post-Brexit and during Covid-19. As a result, Modern Slavery checks have taken place in high volume supply chains (where risk could damage NCG) to see the staffing approach in the country of goods origin.
- 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.
- A review of the NCG Code of Conduct for Suppliers and Contractors took place with the updated code being approved by the Governors in June 2021, mandating all NCG suppliers and their subcontractors to comply with the Act and protect against Modern Slavery. In addition, the Code of Conduct mandates suppliers and subcontractors to comply with other business-related legislation relating to tax, employment issues Equality and the Equality Act, GDPR, health and safety, environmental sustainability, wellbeing, and safeguarding.
- Although a low spend at NCG, we have further reduced the expenditure on low price new goods with potential risks such as common online buying sites, where the supply chain is less manageable for NCG (e.g. for purchases of clothes and electronics) through credit card spend. We have instead referred buyers to the preferred or pre-checked Suppliers where possible.
- NCG has capped its supplier base to increase transparency and to control risk including Modern Slavery. Historically, NCG has inherited a high supplier base due to a series of College mergers across the UK.

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 in to our standard T&C's for procuring goods and services, when contracts are in preparation for renewal, we will incorporate 'Modern Slavery' in to 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 VCS suppliers we will, where needed, guide them in understanding Modern Slavery by providing best practice guides and encouraging voluntary policies.
- We will continue to be alert to new sourcing practices, post-Brexit and Covid-19, to ensure large suppliers continue to protect against Modern Slavery. We will seek help and guidance from Frameworks where required / needed.
- We will ensure that 100% of NCG employees who have roles dealing with suppliers and recruitment, such as the Procurement Team and Category Managers, 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 e-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