

NCG Modern Slavery and Human Trafficking Statement



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 below sets out practices already in place at NCG and any committed actions set for 2016/17 in response to the introduction of the Modern Slavery Act.

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 in excess of £140m. It serves over 45,000 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 endeavors 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 members of staff have a personal responsibility for the successful prevention of slavery and human trafficking with the procurement department taking responsibility lead for overall compliance. The Head of NCG Group Contracts and Procurement will report annually on our compliance with the Act to the Group Executive Board. 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) to Companies House.

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

- Recruitment Policy
- Equality Strategy
- Disclosure Policy

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)

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 our Procurement Department utilises the mandatory Crown Commercial Services (“CCS”) Pre-Qualification Questionnaire on procurements which exceed the prescribed threshold.

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.

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

- We will introduce a “Supplier Code of Conduct” to ask all existing and new suppliers to confirm their compliance with the Act.
- Our procurement department will raise awareness of modern slavery and human trafficking considerations within specific procurement categories. These considerations will then form part of into our tendering procedures for goods, works and services in these categories.
- We will also raise awareness with our employees by distributing flyers, putting up posters and circulating emails on the subject to staff to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business.

- We will more closely monitor those supply chains that have been identified as a potential risk and take appropriate action if necessary.
- We shall include a modern slavery and human trafficking statutory compliance element when undertaking internal audits on non-pay expenditure as part of NCG's audit plan.

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.

A handwritten signature in black ink, appearing to read 'Joe Docherty', with a long horizontal line extending from the end of the signature.

Joe Docherty
Chief Executive of NCG