



# Modern Slavery Statement

## Modern Slavery Statement

<b>Version</b>	V1
<b>Policy number</b>	38

As a company dedicated to helping people improve their lives through learning, we want all individuals that our business impacts to have access to education and employment that helps to improve their circumstances. Modern slavery is contrary to our core purpose to promote and advance learning and our values and beliefs.

We are committed to preventing slavery and human trafficking in all our activities and supply chains.

This statement sets out the actions taken to reduce the potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that our activities and our supply chains are free from slavery and human trafficking. The statement is effective from December 2020, following approval by the NCFE Board of Trustees.

This statement is published in accordance with the UK Modern Slavery Act 2015, which requires that companies publish a slavery and human trafficking statement. This includes slavery, servitude and forced or compulsory labour, as well as human trafficking.

### **About NCFE**

NCFE is a leading provider of educational services and as a not for profit organisation we have a strong heritage in learning and have been at the forefront of technical and vocational education for over 170 years.

We design, develop and certify diverse, nationally recognised qualifications and awards, which have contributed to the success of learners at all levels, bringing them closer to fulfilling their personal goals. Our core purpose is to promote and advance learning, with an emphasis on supporting social mobility and prosperity. Our purpose is what connects our people and creates a vibrant and high performing culture.

This statement applies to all activities of NCFE, an Awarding Organisation (AO) nationally recognised by the qualification regulators for each country of the United Kingdom. NCFE is regulated by the Office of the Qualifications and Examinations Regulator in England, the Welsh Government in Wales and the Council for Curriculum, Examinations and Assessment in Northern Ireland.

### **Definitions**

Modern Slavery is a term used to encapsulate offences in the Modern Slavery Act 2015: slavery, servitude and forced or compulsory labour; and human trafficking. These are defined as:

**Slavery and Servitude Slavery:** Slavery is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the

behaviour on the part of the offender as if he/ she did own the person, which deprives the victim of their freedom. Servitude is the obligation to provide services that are imposed by the use of coercion and includes the obligation for a 'serf' (person working in servitude) to live on another person's property and the impossibility of changing his or her condition.

**Forced or Compulsory Labour:** Forced or compulsory labour is defined in international law by the ILO's Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/herself voluntarily.

**Human Trafficking:** An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. Exploitation of the potential victim does not need to have taken place for the offence to be committed.

## Responsibilities

- **Policies:** Policies are the responsibility of the relevant function and are developed by subject matter experts and through consultation with the wider business and approved by the Executive Team and Board, as required. All policies are reviewed in line with our policy governance framework.
- **Supply Chain management:** NCFE's procurement function is responsible for reviewing the supply chain management with regards to modern slavery and appropriate mechanisms to assess risk.

## Associated Policies

NCFE operates the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations.

- **Whistleblowing policy:** NCFE encourages all its workers, customers and, other business partners to report any concerns related to the direct activities or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make protected disclosures. Employees, customers or others who have concerns can report these to the NCFE People team or if it involves a member of the Executive team, concerns can be reported to the Chair of the Audit, Risk and Investment Committee.
- **Safeguarding Children and Vulnerable Adults policy:** NCFE recognises the right of every individual to stay safe. We are committed to practice in a way that protects them. Our employees, workers, contractors and suppliers instructed by and acting on our behalf should not have any unsupervised contact with children or vulnerable adults during visits or in any other situation as part of their work for us. NCFE recruit and appoint employees and workers who are deemed suitable to work with children and vulnerable adults, based on their declarations of unspent and exempt convictions.

- **Equal Opportunities and Dignity at work policies:** NCFE is committed to ensuring that all colleagues are aware of our Equal Opportunities policy and behaviour we expect when at work or representing NCFE outside of work.
- **Employee Handbook:** The handbook outlines the actions and behaviour expected of our employees when representing the organisation. NCFE strives to maintain the highest standards of employee conduct and ethical behaviour in all business activities and in managing our supply chain.

### **Supplier Due Diligence processes**

Our new supplier process requires each new supplier to declare if they have an up-to-date Modern Slavery Act statement or policy, which allows us to identify potential high-risk suppliers.

For suppliers of a significant value or where we consider a supplier to be operating in a potentially a high-level risk area (e.g. branded merchandise supplier), the procurement team complete a high-level vetting check including reviewing a supplier’s relevant policies and statements. This informs a supplier overall score which influences whether they become an approved supplier.

### **Modern Slavery and our Learners**

While not an area of high risk, we recognise that we may encounter instances where our learners could be at risk of modern slavery. Our Safeguarding Children and Vulnerable Adults policy exists to provide a safe and appropriate learning environment for all our learners. Where an employee or worker has a concern regarding the safeguarding of a learner related to modern slavery, concerns can be raised through our safeguarding procedures and Whistleblowing policy.

### **Training and Development**

In line with our commitment to prevent modern slavery and human trafficking, our employees have access to training and development that is relevant to their role. This includes training to enable employees to understand and identify modern slavery and human trafficking issues, including how to report concerns to the relevant team within our organisation and access external support and advice.

### **Governance and Control**

Approval status: Exec Owner

#### **Different parties and responsibilities**

Date version approved: 12/03/2021		
Approved by:	Louise Shillinglaw, Exec Director People Services	
Next review date:	01/12/2021	Frequency: Annually
Responsible Manager: Lindsay Mitchell, Head of People Services		
Executive Owner: Exec Director People Services		

--

### 15.1 Change History

<b>Date</b>	<b>Version</b>	<b>Created by</b>	<b>Description of change</b>
November 2020	1.0	Louise Shillinglaw	Document created