Modern Slavery Statement Financial Year 24/25

Organisation structure and supply chains

The NDA is a non-departmental public body formed under the Energy Act 2004 to oversee the decommissioning of the UK's nuclear legacy. We are the ultimate parent of the NDA group, with operating companies that undertake and support decommissioning and waste management in the UK, provide specialist transport services, as well as ancillary functions such as training and socio-economic services to our local areas.

The NDA has offices located across the UK. Additional information about the NDA can be found online.

Some key facts and figures about the NDA and its supply chain are provided.

Figures relate to the reporting year 1 April 2023 to 31 March 2024.

337 Suppliers (317 are UK based)

212 Contracts (including 4 Framework Agreements and 73 Call-Off Contracts)

£163.8m Spend

Spend is broken down across six sub-categories of spend;

- Corporate Services & Resourcing
- Facilities Management & Property
- Information Technology
- Site Operations
- Manufactured Products & Services
- Capital Projects & Infrastructure

68 Procurement & Supply Chain Staff Positions

5 Strategic Suppliers

Policies in relation to slavery and human trafficking

NDA recognises its responsibility to operate our business with effective policies and procedures. Key relevant policies include:

- Supply Chain Modern Slavery Guidance: The guidance is based upon the latest Procurement Policy Note issued by the Cabinet Office

  (PPN02/23 – Tackling Modern Slavery in Government Supply Chains) and provides a comprehensive overview of the roles and responsibilities of the commercial practitioner in assessing and mitigating the risk of modern slavery in the supply chain. The supply chain servicing our requirements for goods, services and works is large and includes large multinational organisations, publicly owned bodies as well as small & medium sized suppliers. Through our standard terms and conditions of contract, we require that our supply chain members (no matter what size) support the NDA in its mission to prevent modern slavery and human trafficking in any part of our business or supply chain.
- Code of Conduct and Standards of Behaviour in the Workplace: Our Code of Conduct (supported by policies such as respect at work, diversity & inclusion) sets out the expectations we have of those who work for us in relation to standards of behaviour.
- Speak Up Policy: Our speak up policy encourages the raising of concerns (whether by employees or others in the supply chain) either directly or using the independent SafeCall service to the Group Ethics & Compliance team (overseen by the Audit Risk & Assurance Committee made up of Non-Executive Members of the NDA Board). NDA is committed to listening and acting when speak up issues are raised. No concerns relating to modern slavery were identified during this reporting period.

Due diligence processes

The NDA approach to due diligence and assessment of modern slavery risk within the supply chain is aligned with the UK Government's and our sponsoring department (Department for Energy Security & Net Zero) approach, in that a tiered approach is undertaken.

- Throughout the reporting year any new procurement above the minimum level for open procurement (i.e., £10,000 excl. VAT) has been subject to the NDA Modern Slavery Categorisation Assessment Tool. To assess the potential level of modern slavery risk within the supply chain delivering the proposed contract, the tool uses the following risk indicators as assessment criteria;
    - Industry Type – for example those that involve raw materials and / or are labour intensive
    - Nature of Workforce – for example reliance on temporary or low skilled labour
    - Supplier Location – some countries have a higher predicted risk of modern slavery

- Context in which the Supplier Operates – for example high levels of poverty and unemployment
- Commodity Type – for example imported products as identified in the Global Slavery Index
- Business / Supply Chain Model – for example sub-contracting and complex supply chains.

No contracts were identified to be at greater risk over the reporting period, nor were any issues flagged.

- Should a contract be identified to be at greater risk of modern slavery, we will approach the supplier to complete a self-assessment of their business using the Home Office approved, Modern Slavery Assessment Tool (MSAT). The MSAT is a free, risk identification and management tool that the government has developed for public bodies to use with their suppliers. The tool gives suppliers tailored, good practice recommendations to improve their management of modern slavery risks.
- Where the risk identifier remains identified as “high risk” the NDA will then consider further options including deep-dives and / or site audits.

In the event of modern slavery practices being identified within our supply chain, the NDA will refer to its processes laid out in the Supply Chain Modern Slavery Guidance for referrals and support, in accordance with the principles below;

- The report must be addressed immediately and in a manner that is proportional to the case being reported.
- Work collaboratively with the supplier and in accordance with the terms of the contract to address the issues being raised.
- Development of a remediation plan for handling such occurrences which sets out roles and responsibilities. The core points to consider include;
    - Where we suspect workers are being subjected to modern slavery, we shall involve law enforcement agencies.
    - In the UK, if someone is in immediate danger, it shall be reported to the police by dialling 999. A potential victim can then be referred to the National Referral Mechanism by the police to be formally identified and offered Government funded support.
    - Where concerned about a potential victim, or suspicious about a situation that is potentially exploitive, we will call the Modern Slavery Helpline on 0800 012 1700, or call the Gangmasters and Labour Abuse Authority on 0800 432 0804 or submit a report online.
    - If overseas, then the response should be tailored to the local circumstances.

- We will continually assess the situation and ensure that remediation plans are in place and being progressed.

Risk assessment and management

Although the risk is determined to be low, modern slavery risks are documented in the NDA group, NDA, and commercial risk registers. These registers are reviewed and updated quarterly to ensure that content is and remains relevant and that allocated actions are delivered by the identified owners.

Key activities undertaken during this reporting period to address our Modern Slavery risk

The following steps were taken during this reporting period to further enhance our approach to modern slavery.

- We have continued to develop and implement a route to market for third-party auditing including the ability at short notice instigate further desktop and/or on-site audits.
- We carried out an annual review of our Modern Slavery risk assessment, including any new risks arising due to global or UK events. This has included an update based on the Procurement Policy Notice 02/23 guidance document capturing the publication of the 2023 Global Slavery Index.
- We have concluded our annual review of the guidance given to commercial practitioners, which included how the NDA group electronic sourcing system will further support them in addressing modern slavery risk and changes made in to support the ongoing implementation of Procurement Policy Notice 02/23.
- We are continuing to work closely with Cabinet Office to keep abreast of all up-coming changes that will affect how we address Modern Slavery, as a result of the new Procurement Act 2023.
- NDA Modern Slavery training was mandated for all Commercial employees with successful completion linked to remuneration. The successful completion rate was 100%.

Training on modern slavery and trafficking

Awareness of modern slavery and the risks it poses to the NDA and its supply chain is an essential part of our training programmes.

We use three main modern slavery training packages, and these are available to our commercial practitioners;

- The NDA Modern Slavery training package – developed specifically by the NDA for all members of the organisation
- Crown Commercial Services Modern Slavery Workshops – specifically for procurement and supply chain practitioners
- Government Commercial College Training – a training package on tackling modern slavery in the supply chain using a Personal Protection Equipment case study, available to all procurement and supply chain practitioners.

Aims for the reporting year 2024/25

We set out below our aims to further develop our approach to modern slavery in 2024/25;

- To continue our annual review cycle of the guidance given to procurement and supply chain practitioners, which will ensure alignment with Cabinet Office guidance and Procurement Act 2023.
- To continue to mandate the annual completion of the most up to date NDA Modern Slavery training packages for procurement and supply chain practitioners.
- To promote the NDA Modern Slavery training package on Anti-Slavery Day (18th October 24) to all employees of the NDA who interact with third-party suppliers including those outside the Commercial team.
- To capture and implement the changes to the Modern Slavery PPN anticipated in the Summer 24, in line with the Procurement Act 23, including implementation of the expected revised Modern Slavery Risk Assessment tool.

This statement was approved on 26 September 2024 by the NDA Board of Directors.

Signed on behalf of the NDA by:



David Peattie, FREng HonFNucI

Group Chief Executive Officer