NCS Modern Slavery Statement

Responsible Manager	Kelly Holder, Executive Director of Operations
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Important Note: February 2025

Whilst this statement covers the past year (2023-24), on 12th November 2024 the Secretary of State, Lisa Nandy, gave notice in Parliament of her intention to wind up National Citizen Service Trust (NCS) and to cease its funding from 31st March 2025. For this reason, there may not be a further Modern Slavery Report prepared or published (as NCS may be a skeleton entity and/or its funding may fall below the mandatory reporting threshold) so to the extent that it can, this Statement also covers NCS Modern Slavery compliance in the financial year 2024-2025 as well as 2023-2024.

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 Sponsor	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
6.0	January 2022	Numerous SMEs as above, coordinated by Louka Travlos, Head of Board Governance and Compliance	Michael Devlin, Chief Governance and Transformation Officer / NCS Trust Board, 27 January 2022	Michael Devlin, Chief Governance and Transformation Officer / NCS Trust Board, August 2022	Update of the Statement for FY 20/21, progress made and progress delayed due to Covid 19 pandemic
7.0	22nd September 2022	SMEs including Legal, Commercial, Operations, Finance	22nd September 2022 NCS Trust Board	September 2023	Numerous updates to bring statement up to date and to reflect new operating model. This includes: 1. Incorporation of Modern Slavery references within new contracts 2. Updates to supplier onboarding including training and MS compliance check 3. Updates to staff training 4. Updates to Procurement processes

8.0	Nov 2023	SME's including, legal, Procurement, Operations, Finance, Safeguarding	Kelly Holder, Exec Director of Operations and Transformation April 2024	November 2024	Numerous updates to bring statement up to date and to reflect new operating model. This includes: 1. Exclusion of Covid 19 and the pandemic in any reasoning for delays or updates. 2. Inclusion of our new delivery model with Grantees delivering residential and community experiences alongside a suite of digital experiences. 3. We no longer undertake pre-readiness assessments with our suppliers but offer a free consultancy with Pharos Response who provide Health & Safety and Risk Management advice. 4. Commitment to developing a training webinar for early 2024. 5. Residential Consortium Suppliers' are required to submit their Modern Slavery policies for review and sign off to NCST on an annual basis. 6. NCST undertakes DBS spot checks on partner staff and so far this has revealed no issues. 7. The policies that we share with our providers have been updated to state that; We include NCS Safeguarding Policy and Procedures in all our procurements. In addition, our residential partner also receives our Safer Recruitment Guidance (produced in conjunction with the NSPCC) 8. In the future, we would like to include our digital partners with Pharos Response 9. Our office locations have been updated 10. The contact centre information has been revised to highlight the Customer Escalation team
9.0	Jan 2025	SME's including, legal, Procurement Operations, Finance, Safeguarding	Kelly Holder, Exec Director of Operations and Transformation Feb 2025		Reviewed and Amended by Munira and Amanda and Link sent to Kerry 27th Jan 2025

NCS Trust Modern Slavery Statement for the Financial Year 1st April 2023 to 31st March 2024

Modern Slavery Statement

The National Citizen Service Trust (the Trust) is committed to acting ethically and with integrity within our organisation and throughout our supply chains in accordance with the Modern Slavery Act 2015 (the MSA). We expect the highest standards of ourselves, our suppliers and all our business partners.

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 its network. We embrace the transparency encouraged by the MSA. This statement sets out for the public, our stakeholders, suppliers and employees the steps The Trust has taken, in the financial year 1st April 2023 to 31st March 2024 (as well as to the extent possible 1st April 2024 to 24 February 2025), to ensure that no slavery or human trafficking is taking place, in any part of its business or supply chain.

Definitions and indicators 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 terms and types of abuse that can constitute *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

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

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

Through its policies and practices the Trust takes into account the full spectrum of modern slavery from *child sexual exploitation to labour abuse*, *forced labour and labour exploitation*.

Child sexual exploitation 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 includes 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 involve the control, force or coercion of an individual to perform work. Indicators of labour exploitation include restrictions on movement, debt-bondage, removal of identity documents, psychological manipulation and threats of, or actual violence.

Policies to combat 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 wrong-doing without any risk to themselves. To ensure that the Trust recruits and treats employees fairly and eliminates any possibility of modern slavery, our human resources (HR) policies set out the procedures for how the Trust:

- Recruits and selects employees in a fair, lawful and professional manner, both for internal and external candidates.

- Treats 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.
- Manages the offboarding 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 and partner staff need to be aware of behavioural and physical signs that victims show.

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

Code of Conduct Policy
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.

Whistleblowing 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, Equity & Inclusion Policy
Ensures that we foster a fair and inclusive workplace, where our people are valued, their differences are respected, and all forms of discrimination are proactively opposed.

In addition to the policies above, the Trust conducts mandatory online safeguarding training for all its own staff and partner staff. This training is reviewed annually.

Structure of NCS and its supply chains

NCS programme delivery comprises the Trust and its network of organisations delivering youth development activities to young people from the United Kingdom primarily aged 16-17 years, but with scope to expand some activity to young people aged 15-24. The Trust also contracts with other 3rd party suppliers to support the delivery of these key activities, as well as its core functions. The Trust and its partner network place the wellbeing of young people and adults at

its core, and take their responsibility to prevent modern slavery extremely seriously.

The organisation - The Trust is a Royal Charter Body with a mandate from the National Citizen Service Act (2017) to commission the National Citizen Service (NCS) which fosters social integration and supports young people in England to develop communication, leadership and team-working skills so that they are both work ready and life ready. The role of the Trust is to commission, set performance standards and effectively manage its supply chain of network partners to deliver high quality youth activities that achieve its defined social impact objectives. The Trust does not have subsidiaries or a parent company, and provides services wholly in the UK. The Trust has two offices, one in Stratford, London and the other in Manchester. We have a customer escalation team, NCS participants are able to contact this team in regard to their NCS programme.

Network - The Trust's network of partners and grantees delivers a range of residential and community services across England and a suite of digital experiences. In some cases, Partners / Grantees will also have Tier 3 suppliers that work with them to support them with their NCS delivery.

In addition to suppliers who deliver or support the delivery of NCS programme activities, the Trust's supply chain also includes suppliers who support its core functions. These organisations provide a range of goods and services such as marketing, technology, HR, research & evaluation, facilities, consumables, travel and accommodation.

(A) Contract spend and management - The total spend with all suppliers for FY 2023-24 (01/04/2023-31/03/2024) was £52,50,000 (2022-23 being £53,576,000**)** (2021-22 being £60,015,007) with 67% (2021-22 being 90%) of this spend with 13 strategic suppliers. 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 reflect the actual services delivered.

Due diligence in relation to slavery and human trafficking

The Trust's procurement activities are subject to the Public Contracts Regulations (2015) (for future years the Trust will also be subject to the successor Procurement Act 2023 which goes live in February 2025). When procuring goods and services the Trust endeavours to contract on its own Terms and Conditions wherever possible. These terms are regularly reviewed and updated to comply with relevant legislation and obligations on public bodies including those related to modern slavery. The commercial steps the Trust has taken to comply with the legislation are outlined below.

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.

The Trust is registered as a buyer with the Gov.uk Modern Slavery Assessment Tool (MSAT) which supports 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. NCS Trust Procurement as part of its onboarding process encourages new suppliers to register on MSAT.

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 websites, update it annually and have it approved by their board and signed by a director. It also has to be published and easily accessible on the supplier's home page on their web site. NCS Trust Procurement as part of its onboarding process check a Modern Slavery Statement is in place where required for all new suppliers. As part of Contract Management protocols, Modern Slavery updates will form part of the ongoing contract management activities and, where appropriate, contracts will be amended to reflect the supplier obligations. Supplier status with respect to Modern Slavery will be tracked ongoing and available for reporting as and when required.

Residential Service Line providers: The revised Residential Partner Services Agreement ensures that all our Residential Consortium Suppliers adhere to all Modern Slavery legislation in line with the Modern Slavery Act 2015 through an updated Modern Slavery Prevention and Reporting Procedure.

Prior to the commencement of the Residential Services contract, the Consortium Suppliers were required to share with NCST, their current Modern Slavery and Human Trafficking Policy. This Policy is included within the list of defined contractual guidance, policies and standards that must be adhered as part of the delivery of the Contract. As part of the implementation for the service, NCST reviewed and signed off the Modern Slavery and Human Trafficking policy to ensure that the Consortium Suppliers policies align with the stated requirements of the Residential Contract and NCST Guidance, Policies and Standards.
To ensure that the contents of the Residential Consortium Suppliers' Modern Slavery and Human Trafficking Policy remain relevant and accurately reflect any

updates to the Modern Slavery Act, the Suppliers are required to submit the policies for review and sign off to NCST on an annual basis. If there are any omissions or errors within the updated policy, NCST will allow the Suppliers to make the required amendments within a specified timeframe before reviewing. The requirements and timeframes for this activity are covered within the Residential Services Contract Management procedures.

Grant Service Line providers: The Trust does not undertake any formal pre-delivery readiness assessments with our Grantee organisations, we do however, offer a free consultancy with Pharos Response who provide Health & Safety and Risk Management advice.

Digital service line partners / providers: We include NCS Safeguarding Policy and Procedures in all our procurements. We ask all suppliers, including digital experiences to publish their Modern Slavery statement. For Digital Experiences, Modern Slavery is included as part of the initial registration process as pass/fail criteria.
Post award the Trust does not undertake any formal pre-delivery readiness assessments with our Digital organisations.

Risk assessment and management

The Trust takes its obligation to tackle modern slavery extremely seriously and has robust risk management and reporting procedures in place. It 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 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.

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 the NCS Safeguarding Policy and Procedures and Safer Recruitment Guidance (produced in conjunction with the NSPCC)

The "NCS confidential concerns" phone 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.

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.

To mitigate these risks, in collaboration with Barnardos the Trust has delivered safer recruitment training and issued a webinar to our Network Partners to ensure they are aware of their obligations to ensure that robust measures continue to be in place and applied appropriately. 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.

Spot checks on these DBS certificates have not revealed any issues. The Trust's residential provider also includes training on Modern slavery as part of safeguarding onboarding training.

Partner contracts make specific reference to modern slavery legislation compliance.

Training on modern slavery and trafficking

The Trust will seek to 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.

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. This is reported using the Incident Reporting process which escalates in a structured way through the Trust to the Executive Director of Operations and Transformation.

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 will lead on the next actions that are to be taken. This will be on a case-to-case basis. The 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 a potential victim of human trafficking and modern slavery and providing appropriate care) (England and Wales/Scotland/Northern Ireland)
- Referral to an external agency

Modern slavery concerns connected to a Network Partners or third-party contractors

If there are any identified concerns about any network partner, a network partner's supplier tier, or an NCS supplier (who is not part of the delivery network) regarding the possible occurrence of modern slavery, the following actions must be taken:

1) Concern is identified within the supply chain: suppliers are required to inform their Trust point of contact, who will escalate it through the appropriate channels. The Trust's Executive Director of Operations and Transformation will be kept informed of high level incidents for appropriate reporting and governance.

2)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 will escalate it to their Department lead, keeping the Trust's Executive Director of Operations and Transformation informed accordingly.

3) The Trust's Executive Director of Operations and Transformation will take appropriate action, which may include informing the Trust senior legal sponsor, CEO, board or government sponsor.

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-by-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
- In cases where the breach is sufficiently serious the relevant department may consider suspension or termination of the grant agreement, and may take action to recover some or all of the funds paid.

Any serious concerns connected to modern slavery will also be shared with the Chief Executive Officer and the Trust's Legal Director. A high-level report and any actions taken may be shared with the Trust's board and sponsor department. The Trust will make every effort to protect the privacy of individuals concerned in line with our Data Protection and Privacy Policies.

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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