



NCS Modern Slavery Policy

Responsible Manager	Debra Cook
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Distribution list	Trust and Network

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		October 2019, Debra Cook	Introduction of procedure
2.0	September 2018	Debra Cook, Safeguarding Manager	Amy Franklin, 09/11/2018	September 2019	<p>Update of policy evidencing NCS commitment to ensuring that there is no slavery, servitude, forced or compulsory labour or abuse of power with NCS and the supply chains.</p> <p>Evidence of systems to ensure Modern Slavery is not taking place within our supply chains</p> <p>Evidence of robust recruitment systems and DBS checking</p>

Modern Slavery

The following pieces of legislation are relevant to this procedure:

Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015; Modern Slavery Act 2015; Criminal Justice (Scotland) Act 2003; Asylum and Immigration (Treatment of Claimants, etc.) Act 2004; Criminal Justice and Licensing (Scotland) Act 2010.

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 NCS Safeguarding Policy and Procedures.

The different types of abuse that come under the umbrella term of Modern Slavery are:

- Slavery, servitude and forced or compulsory labour (s.1 MS Act)
- Human Trafficking (s.2 MS Act) (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)

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

NCS Commitment

NCS 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 (Modern Slavery Act) in any part of our organisation or in our supply chain.

NCS welcomes transparency as encouraged by the MSA and this statement sets out for the public, our stakeholders, suppliers and employees the steps we are taking in this regard.

Recruitment

At the point of recruitment, appropriate checks in accordance with relevant laws are carried out on prospective employees and our HR team works closely with the relevant

teams in the local territories to make sure that pay and conditions are appropriately managed.

In accordance with our commitment to acting ethically and with integrity in all our business relationships, we intend to implement effective systems and controls to ensure Modern Slavery is not taking place in our supply chains. This will involve ensuring the effective communication and reinforcement of relevant policies, which give a clear view of the values and principles that underpin all our work and that we expect all persons involved in our business and supply chain to adhere to. These policies comprise of the NCS Programme Delivery Personnel Code of Conduct and the NCS Diversity and Inclusion Policy for Programme. Furthermore, the NCS whistleblowing line ensures that there is a direct reporting system for all concerns.

Indicators of Modern Slavery

Child Sexual Exploitation is a named type of abuse in its own right. This 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.

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.

Under the Modern Slavery Act 2015, we are required to ensure we do not have any aspect of modern slavery within our own organisation and within our supply chain. As such, we have to issue a statement, published on our website, which clearly reflects this and the actions we have taken and will continue to take, in order to address this.

Responding to concerns about modern slavery

If any staff member or volunteer within NCS has any suspicions or concerns that any aspect of modern slavery may be occurring, they must take appropriate actions. Relevant procedures for doing this are detailed below:

Internal NCS staff or volunteer working with service users

1. Concern is identified: this could be a service user is a victim or perpetrator, or a service user informs us of a concern they have
2. Staff member discusses this with their line manager (where appropriate) and the Safeguarding Manager immediately.

please 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

Next steps

According to the nature of the concern, the Safeguarding Manager will lead on the next actions that are to be taken. This will be on a case-to-case basis. 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 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 concern connected to a supply chain delivery partner

If there are any identified concerns about any supply chain partner and the possible occurrence of modern slavery, the following actions must be taken:

1. Concern is identified within the supply chain.
2. This is discussed with the relevant Management Partner, who will immediately alert the Safeguarding Manager.
3. Safeguarding Manager will take appropriate action.

please 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 Management Partner will lead on the next actions that are to be taken. This will be on a case-to-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
- Suspending our contract with the supply chain delivery partner
- Undertaking our own investigation into the safeguarding of our service users while participating in supply chain partner activities
- Taking a final decision regarding the resuming or termination of our contract with the supply chain partner

Any identified concerns connected to Modern Slavery will also be shared with the Chief Executive and our legal counsel.

Please note - a discussion as to NCS Trust's future relationship with the relevant delivery partner to ensure appropriate action to be taken.

Contact Details for Safeguarding Manager

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