



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	September, 2017, SLT	October 2018, Debra Cook	Introduction of procedure
2.0	September 2018	Debra Cook, Safeguarding Manager	09/11/2018, Amy Franklin	September 2019, Debra Cook	<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 Disclosure and Barring Service (DBS) checking</p>
3.0	September 2019	Debra Cook, Safeguarding Manager	09/11/2018, Amanda Best	September 2020, Debra Cook	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, Safeguarding Manager	09/11/2018, Pending approval	September 2021, Debra Cook	Update of policy to address extra recruitment risks due to Covid-19 and evidence of how these risks are being mitigated

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

The Trust's commitment

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 (Modern Slavery Act) in any part of the organisation or the network.

The Trust 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 the Trust People Team works closely with the relevant teams in the local territories to make sure that pay and conditions are appropriately managed.

In accordance with the Trust's commitment to acting ethically and with integrity in all business relationships, the Trust intends to implement effective systems and controls to ensure Modern Slavery is not taking place in 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 the Trust's work and that the Trust expects all persons involved in the NCS Programme 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, the Trust is required to ensure it does not have any aspect of modern slavery within its organisation and within the supply chain. As such, the Trust has issued a statement, published on its website, which clearly reflects this and the actions the Trust have taken and will continue to take, in order to address this.

Responding to concerns about modern slavery

The National Citizen Service acknowledges that there has been increasing recognition of forms of exploitation that fall under the "umbrella" of Modern Slavery such as child exploitation by county lines drugs gangs. Furthermore that a child under 18 is not able to consent to any form of modern slavery.

If any NCS Programme personnel or volunteer within the network 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 Programme personnel 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. NCS Programme personnel discusses this with their line manager (where appropriate) and the Trust's 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 Trust's 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 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.. The Trust's 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 the contract with the supply chain Delivery Partner
- Undertaking an investigation into the safeguarding of service users while participating in supply chain partner activities

Covid 19

In the context of a rapidly changing landscape due to Covid 19, NCS is aware that in all business, new or increased modern slavery risks poses additional risk and that the furloughing of some staff within our delivery chain has the potential to compromise recruitment practices. Moreover, NCS understands the DBS service has experienced delays and alternative methodologies in processing all applicants.

To mitigate these risks, NCS has audited the safer recruitment procedures of our delivery partners and is in the process of negotiating bespoke safer recruitment training with Barnardos in order to ensure that all stakeholders are aware of their obligations to continue to ensure robust measures are in place. Training will be available to all new delivery partners and all those identified as needing extra guidance.

Identified Concerns

Any identified concerns connected to Modern Slavery will also be shared with the Chief Executive and the Trust's Legal Counsel.

Please note – a discussion will be had as to the Trust's future relationship with the relevant partner to ensure appropriate action has been taken.

Contact Details for the Trust's Safeguarding Manager

Name: Debra Cook

Telephone: 07375 572211