

Nacro is opposed to all forms of modern slavery and is committed to acting ethically and with integrity in all its business relationships. We take steps to ensure that adequate processes and controls are in place to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes Nacro's slavery and human trafficking statement for the financial year ended 31 March 2021.

Nacro is a registered charity providing a range of services including accommodation and support to vulnerable people; education and skills training to young people outside of mainstream schooling; and help to people in custody to integrate back into society across England and Wales. We employ 900 staff supporting and providing services to approximately 10,000 beneficiaries through our education, housing, health, justice and advice services.

Our supply chains cover goods, services and works necessary to support:

- delivery to front line services including cleaning and property maintenance
- "back-office" services that keep the business operating efficiently

This statement is approved by the Nacro Board of Trustees and is reviewed and updated annually.

Supply Chain

At Nacro, we are continuously improving our practices to identify and eliminate any slavery and human trafficking in our business and supply chains, and to act ethically and with integrity in all our business relationships.

We use a wide range of contractors, suppliers and partners who provide services, goods and supplies to support our operational delivery.

Policy Framework

We have an extensive and robust framework of policies, procedures and contractual requirements in place to support our undertaking and underpin our approach to tackling the risk of modern slavery in our supply chain. These include:

a. Procurement Policy

Nacro will only trade with those who fully comply with this Policy or those who are taking verifiable steps towards compliance. Nacro will assess any suspected instances of non-compliance on a case-by-case basis and take appropriate remedial action.

Nacro's procurement seeks to identify and mitigate risks in supply chains particularly around modern slavery and human trafficking. During 2021/22 we aim to ensure that all new procurement activity addresses the following areas:

- i. Contract clauses that require our supply chain to use reasonable endeavours to ensure that its employees or agents and/or supply chain shall act in a way which is compatible with the Modern Slavery Act 2015.
- ii. Our supply chain, and where relevant, publish a statement as required by the Act.

- iii. A right for Nacro to audit our supply chain providers' procedures and processes to ensure that they comply with the Modern Slavery Act 2015. Where a supply chain provider is not compliant, the right for Nacro to require that provider to take remedial actions as requested to address any areas of concern, or to cancel the contract.

b. Staff Recruitment

Our recruitment and people management systems follow the recommended practice given in the Baseline Personnel Security Standard and are designed to ensure that all prospective employees are legally entitled to work in the UK. Policies, procedures and support are in place for staff to raise concerns if they are experiencing any type of abuse once in our employment.

c. Safeguarding Policy

Nacro has a Safeguarding Policy in place to ensure that all suspected cases of neglect or abuse are investigated and reported. A designated safeguarding officer (DSO) structure is in place that gives access to trained local DSOs. In addition each service has a safeguarding lead who will ensure continued compliance and deal with safeguarding concerns.

d. Whistleblowing Policy

Our Whistleblowing Policy provides advice to colleagues, Board and Committee Members about how to report any instances of malpractice within our organisation or supply chain.

e. Lettings Policy

When signing up new tenants we undertake background and identification checks. Our tenancy services team will always investigate any allegations regarding potential tenancy fraud.

f. Training

We are committed to raising awareness amongst colleagues about anti-slavery and human trafficking. This topic will be a regular feature in our Equality, Diversity and Inclusion training plans.

We will further enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers and in relation to our own operations.

This statement has been formally approved by the Nacro Board of Trustees.



Campbell Robb
Chief Executive