



Modern Slavery Statement

Document Control		
Document Number:	PS-038	Effective from: 01-11-2020
Linked Regulatory Requirements:	The Modern Slavery Act 2015	
Version Number & Date:	V1.3, 20-02-2025	Review date: 20-02-2025
Date of Next Review:	30-09-2025	Classification Level: Public/General

Approval Level: High Impact

Approved by: Helen Ketteringham, Chief Peoples Officer (Executive)



Date version approved: 20-02-2025

Version Number	Date	Changes
V1.2	09-2024	Annual review. Section 6 updated relevant documents – sentence added to safeguarding policy bullet point. Approved by the Board 01-10-2024
V1.3	02-2025	Signature added to document. Section 2.3 Responsibilities/duties updated.

Table of Contents

1. Modern slavery statement	4
2. Introduction	4
2.1. About NCFE	4
2.1. Purpose	4
2.2. Scope	4
2.3. Responsibilities/duties	5
2.4. Definitions	5
2.5. Location	6
3. Supplier due diligence processes	6
3.1. Modern slavery and our learners	6
4. Initial Equality Impact Assessment	6
5. Training	7
6. References to associated documents	7
7. Implementation and dissemination	8
8. Monitoring arrangements	8
9. Data retention	8
10. Contact Information	8

1. Modern slavery statement

As a company dedicated to helping people improve their lives through learning, we want all individuals that our business impacts to have access to education and employment that helps to improve their circumstances. Modern slavery is contrary to our core purpose to promote and advance learning and our values and beliefs.

We are committed to preventing slavery and human trafficking in all our activities and supply chains.

This statement sets out the actions taken to reduce the potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that our activities and our supply chains are free from slavery and human trafficking. The statement is effective from December 2020, following approval by the NCFE Board of Trustees.

This statement is published in accordance with the UK Modern Slavery Act 2015, which requires that companies publish a slavery and human trafficking statement. This includes slavery, servitude and forced or compulsory labour, as well as human trafficking.

2. Introduction

2.1. About NCFE

NCFE is a leading provider of educational services and as a not-for-profit organisation we have a strong heritage in learning and have been at the forefront of technical and vocational education for over 175 years.

We design, develop, and certify diverse, nationally recognised qualifications and awards, which have contributed to the success of learners at all levels, bringing them closer to fulfilling their personal goals. Our core purpose is to promote and advance learning, with an emphasis on supporting social mobility and prosperity. Our purpose is what connects our people and creates a vibrant and high performing culture.

This statement applies to all activities of NCFE, an awarding organisation (AO) nationally recognised by the domestic regulators. NCFE is regulated by the Office of Qualifications and Examinations Regulation in England, Qualifications Wales in Wales and the Council for the Curriculum, Examinations and Assessment in Northern Ireland.

2.1. Purpose

This statement has been created to ensure we comply with modern slavery legislation and make sure no one is disadvantaged in the creation or usage of any of our products. This will help achieve our aim of helping create a fairer society.

2.2. Scope

This document applies to NCFE in the making of our products and when we procure services from others to ensure that they comply with modern slavery legislation.

2.3. Responsibilities/duties

Please note that while this is a signed document the signatory is not wholly accountable for this document. The People Services team is responsible for ensuring the policy is up to date and reviewed on a yearly basis

NCFE's Procurement and Supply department is responsible for reviewing the supply chain management regarding modern slavery and appropriate mechanisms to assess risk.

2.4. Definitions

Word/Acronym	Definition
Modern slavery	This is a term used to encapsulate offences in the Modern Slavery Act 2015: slavery, servitude and forced or compulsory labour; and human trafficking.
Slavery and servitude slavery	Slavery is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/she did own the person, which deprives the victim of their freedom. Servitude is the obligation to provide services that are imposed using coercion and includes the obligation for a 'serf' (person working in servitude) to live on another person's property and the impossibility of changing his or her condition. Document stating results or evidence of activities performed.
Forced or compulsory labour	Forced or compulsory labour is defined in international law by the ILO's Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work, or service is exacted from any person under the menace of any penalty and for which the person has not offered him/herself voluntarily.
Human trafficking	An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. Exploitation of the potential victim does not

	need to have taken place for the offence to be committed.
Policies	Policies are the responsibility of the relevant function and are developed by subject matter experts and through consultation with the wider business and approved by the Executive team and Board, as required. All policies are reviewed in line with our policy governance framework.
Supply chain management	NCFE's Procurement and Supply department is responsible for reviewing the supply chain management with regard to modern slavery and appropriate mechanisms to assess risk.

2.5. Location

This statement will be available on the public facing website of NCFE to comply with our legislative requirements.

3. Supplier due diligence processes

Our new supplier process requires each new supplier to declare if they have an up-to-date Modern Slavery Act statement or policy, which allows us to identify potential high-risk suppliers.

For suppliers of a significant value or where we consider a supplier to be operating in a potentially a high-level risk area (such as branded merchandise supplier), the Procurement and Supply team completes a high-level vetting check including reviewing a supplier's relevant policies and statements. This informs a supplier overall score which influences whether they become an approved supplier.

3.1. Modern slavery and our learners

While not an area of high risk, we recognise that we may encounter instances where our learners could be at risk of modern slavery. Our Safeguarding Children and Vulnerable Adults Policy exists to provide a safe and appropriate learning environment for all our learners. Where an employee or worker has a concern regarding the safeguarding of a learner related to modern slavery, concerns can be raised through our safeguarding procedures and Whistleblowing Policy. Where an employee or worker has a concern regarding the safeguarding of a learner related to modern slavery, concerns can be raised through our safeguarding procedures and Whistleblowing Policy.

4. Initial Equality Impact Assessment

An Initial Equality Impact Assessment has been completed for this policy, and no concerns were raised.

5. Training

In line with our commitment to prevent modern slavery and human trafficking, our colleagues have access to training and development that is relevant to their role.

This includes training to enable colleagues to understand and identify modern slavery and human trafficking issues, including how to report concerns to the relevant team within our organisation and access external support and advice.

6. References to associated documents

NCFE operates the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations.

- **Whistleblowing Policy:** NCFE encourages all its workers, customers and other business partners to report any concerns related to the direct activities or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make protected disclosures. Employees, customers, or others who have concerns can report these to the NCFE People Services team or if it involves a member of the Executive team, concerns can be reported to the Chair of the Audit, Risk and Investment Committee.
- **Safeguarding Children and Adults at Risk Policy:** NCFE recognises the right of every individual to stay safe. We are committed to practice in a way that protects them. Our employees, workers, contractors, and suppliers instructed by and acting on our behalf should not have any unsupervised contact with children or vulnerable adults during visits or in any other situation as part of their work for us without the vetting outlined in the safeguarding procedure. NCFE recruits and appoints employees and workers who are deemed suitable to work with children and vulnerable adults, based on their declarations of unspent and exempt convictions.
- **Equal Opportunities and Dignity at work policies:** NCFE is committed to ensuring that all colleagues are aware of our Equal Opportunities Policy and behaviour we expect when at work or representing NCFE outside of work.
- **Colleague Handbook:** The handbook outlines the actions and behaviour expected of our employees when representing the organisation. NCFE strives to maintain the highest standards of employee conduct and ethical behaviour in all business activities and in managing our supply chain.
- **Procurement Strategy**
- **Procurement and Supply Policy**

7. Implementation and dissemination

This statement will be available publicly on the NCFE website to enable our customers and suppliers to see our commitment to ensuring no form of modern slavery takes place in our products.

8. Monitoring arrangements

This statement will be looked at by the People Services team on an annual basis and updated on our website to comply with our legislative duties.

9. Data retention

There will be provider data stored under this statement as a way of making sure our providers are compliant with modern slavery legislation.

10. Contact Information

If you have any queries about the contents of the policy, please contact the Customer Support Team.

Email: customersupport@ncfe.org.uk

Telephone*: 0191 239 8000

NCFE
Q6, Quorum Business Park
Benton Lane
Newcastle upon Tyne
NE12 8BT

*To continue to improve our levels of customer service, telephone calls may be recorded