



Modern Slavery Statement and Policy

Reviewed by:

Anne Skillcorn

Last review Date:

01 November 2022

Next review Date:

01 April 2023

Modern Slavery Statement and Policy

This statement is made on behalf of NAC Group Holdings and its subsidiary companies with regards to the Modern Slavery Act 2015 which requires large employers to be transparent about their efforts to eradicate slavery and human trafficking within their organisation and supply chains.

This statement and policy will be reviewed each financial year in accordance with clause 6 of the Modern Slavery Act 2015.

College policy and statement

NA College is committed to working towards the eradication of slavery and human trafficking. This document acknowledges the legislation and laws implemented by the Modern Slavery Act 2015 and details the steps that the organisation is taking to work towards the provision of the Act.

We are committed to ensuring that there is no slavery or human trafficking in our organisation. This policy reflects our commitment to acting ethically and with integrity in all our business relationships.

Organisation structure

NAC Group Holdings provides education and training to a wide range of learners from age 16 to adult.

The College's subsidiary organisations include;

- NA College Trust
- NA College
- NAC Training
- NAC MSS Ltd
- NAC Outsourcing
- NAC Agency
- Stream on Demand
- NA Consultants
- UK Community Production Limited
- NAC Trading Holdings
- NAC Trading

Our supply chains and links to the College

NA College has several suppliers for various parts of the organisation. These include but are not limited to:

- Agency staff including teaching and business support
- Business partners
- Apprentice employers
- Institute of Technology
- IT support
- Legal insurance
- Catering suppliers
- Stationery suppliers

- Work wear suppliers
- External contractors including confidential waste disposal, maintenance of fire alarms, air conditioning units
- Payroll and accounts package
- Printing of college materials
- Advertising, including digital and print
- Sponsorship

Due diligence processes for slavery and human trafficking

NA College is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our suppliers, contractors and business partners.

All employees and persons employed within the College are asked to familiarise themselves with college policy at the start of their employment or association, and are contractually obligated to adhere to the College's policies.

We are satisfied from our own due diligence measures that there is no evidence of any act of modern-day slavery or human trafficking within our own organisation.

The College will not knowingly support or deal with any businesses found to be involved with any acts of slavery or human trafficking.

The College has a policy of zero-tolerance on matters of slavery and/or human trafficking and expects suppliers and associated businesses to comply with these values.

The vast majority of the College's sources are from inside the United Kingdom and as such are less at risk of slavery and human trafficking issues.

The College also has a policy for the protection of whistleblowers, to protect those raising the issue of slavery and human trafficking within the organisation.

The steps we will take to further the goals of the Modern Slavery Act 2015 are:

- Conducting risk assessments to determine which parts of the College and its suppliers are most at risk of modern slavery so that efforts can be focused on those areas
- Engaging with our suppliers and business partners to convey to them the College's position on modern slavery and to understand the measures taken to prevent modern slavery in their own businesses
- Publishing this statement and policy on the College's website to clearly display the College's support to end modern slavery.

Responsibility for the policy

Ultimate responsibility for the prevention of modern slavery within NA College rests with NA College's Senior Management Team. NA College has overall responsibility for ensuring that this policy and its implementations comply with our legal and ethical obligations.

Head of Departments are responsible for ensuring those reporting to them understand and comply with this policy.

Reporting modern slavery within the College or its suppliers

NA College's whistleblowing and safeguarding policies are intended to provide guidance on how concerns can be communicated to the organisation. Concerns about suspected modern slavery associated with the College may be reported by employees in this manner. The whistleblowing and safeguarding policies can be found on the company's network M:\NAC Centre\01 Centre Info\01 Policies.

To summarise, any suspected instance of modern slavery or human trafficking within NA College or its suppliers must be reported to one of the College's designated Safeguarding Officers, who will investigate and advise the appropriate people of any further actions.

The details of Safeguarding Officers are widely available to all staff members and are displayed throughout the college.


Communication and awareness of this policy

The Modern Slavery Statement and Policy can be found on the company's network M:\NAC Centre\01 Centre Info\01 Policies. The location of policies is conveyed to all staff members at their induction and available to view at any time. This policy is also displayed on the College website. www.nacollege.ac.uk

Review

The Modern Slavery Statement and Policy will be reviewed annually at the beginning of each financial year by NA College's HR team and signed off by a member of the colleges Senior Management Team in accordance with clause 6 of the Modern Slavery Act 2015

This policy is approved by:

Position:	Name:	Signature	Date
Chief Financial & Executive Officer	Lisa Snaith		06/12/2022: