

Modern Slavery Statement 2022/23

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1. Director General's statement

I am fully committed to tackling Modern Slavery and human trafficking as one of our operational priorities. We work hard with our partners in law enforcement – here and abroad – to protect the most vulnerable in society. We want to build on this in our procurement processes and in the supply chain and enhance the current activity in this area.

This statement sets out the steps we are taking to reduce of risk of Modern Slavery within our supply chains.

We will use our expertise to raise awareness across the National Crime Agency (NCA) and amongst our suppliers. We will make it easy for people to report non-compliance. Where there are reports of non-compliance, we will ensure accountability. We will firstly support and guide suppliers and staff to develop capability. Where Modern Slavery persists, we will work with partners to report and hold the perpetrators to account.

Modern Slavery is a blight on society. I am fully committed to tackling this as one of the NCA's operational priorities and by taking meaningful steps to reduce risk within the NCA's supply chains.

2. Executive summary

This is the NCA's first Modern Slavery Statement, detailing the steps to tackle Modern Slavery within its supply chains. It builds on our mission to tackle Human Trafficking and Modern Slavery.



The NCA will look to increase capability so officers can meaningfully work with suppliers to reduce the risk of Modern Slavery within the supply chain and put in place robust due diligence measures to identify and mitigate against the risk of Modern Slavery throughout its commercial processes.

As part of its first Modern Slavery statement, the NCA has committed to:

1. Utilise the guidance from the Government Commercial Function to reduce the risk of Modern Slavery within existing contracts and for any new procurements, especially within higher risk supply chains.
2. Work with the other stakeholders, including other government departments, policy institutions and academics, to inform our approach and strive for continual improvement.
3. Put in place systems to ensure the NCA governance arrangements include consideration of Modern Slavery and [Social Value](#) where appropriate.
4. Establish a system for the Commercial Policy, Governance and Assurance Team to spot check key contracts to ensure taking steps to reduce the risk of Modern Slavery is explicitly part of the terms and conditions.
5. Undertake a Modern Slavery risk assessment of all new Gold contracts and a proportionate number of Silver contracts. Where the risk is highest, specific action will be taken to support, educate and work with suppliers.
6. Undertake an organisational wide communication campaign and promote training for all officers starting with Commercial to raise awareness and share best practice about tackling Modern Slavery through events and communications.
7. Make it straightforward for officers and suppliers to report non-compliance.
8. Help Officers avoid buying goods and services where there is significant risk of Modern Slavery in commercial supply chains.
9. Commit to reporting back on the agreed KPI's in the next iteration of the statement.

3. Organisational structure

The NCA is the national law enforcement agency charged with leading the UK's fight to cut serious and organised crime (SOC), in accordance with the Crime and Courts Act 2013. We have officers based in England, Wales, Scotland and Northern Ireland, as well as a network of International Liaison Officers in key locations around the world. We work closely with partners in Government, law enforcement and the national security community to lead and coordinate a comprehensive response in the UK, at the border, overseas and online.

The NCA is a non-ministerial government department. The Director General is the head of the Agency and the Agency's Accounting Officer. The Director General is accountable to the Home Secretary for Agency performance, and through the Home Secretary to Parliament. Whilst the Director General's



principal accountability is to the Home Secretary, the NCA is also subject to inspection, review and scrutiny by Parliamentary and independent bodies, including representatives from the Devolved Administrations.

4. Key operational achievements

Tackling Modern Slavery and Human Trafficking (MSHT) is a key operational priority for the NCA. We report on our performance on this strategic priority in our annual report. Our key operational achievements in 2021/21 focused on the most sophisticated Organised Crime Groups operating in the agriculture, food and sex industries:

- Overall, we achieved 31% more disruptions against MSHT, leading to the protection of 109 children and 823 adults.
- We worked with industry to increase the intelligence on criminality in the online sex advertising market, and forced the closure of a harmful Chinese-language Adult Services Website. This safeguarded potential victims and reduced opportunities for further offending.
- We delivered awareness campaigns on the risks of exploitation online through collaborative advertising via Google Ads and on ethical consumer choices, helping the public to make more informed decisions.
- We coordinated four phases of a long-running piece of activity to tackle MSHT. This led to 54 UK arrests for child exploitation and 33 arrests for sexual exploitation. Through this we identified 400 potential victims of MSHT (72 children and 328 adults), with 207 of these referred for safeguarding. The linked activity across Europe resulted in 175 further arrests and 187 further potential victims identified.

5. The NCA's arrangements to oversee the governance of the commitments in the Modern Slavery Statement

The Director General, as Accounting Officer for the NCA, has responsibility for the propriety and regularity of the public finances. Jacqui Smillie is the Chief Financial Officer and oversees the steps we have taken to prevent Modern Slavery in our supply chains.

The Chief Financial Officer is supported by the Commercial Policy, Governance and Assurance Team. The team oversees how our commercial function addresses Modern Slavery risks in our supply chains.

The NCA's Commercial Policy, Governance and Assurance Team is supported in this work by the NCA's Modern Slavery and Trafficking Unit which leads the NCA operational response. This team works in partnership with law enforcement on human trafficking cases, setting out investigative options, and provides advice on best practice to support victims. This team will provide advice and guidance alongside training across the organisation.

6. Working in partnership with experts and policy makers

The Modern Slavery Act requires businesses over a certain size to disclose each year what action they have taken to ensure there is no Modern Slavery in their business or supply chains. The NCA wants to do more because we recognise it is the right thing to do. The NCA will follow the guidance set out in the [Policy Procurement Note \(PPN\) 05/19](#). This will inform how the NCA identifies and mitigates against the risk of Modern Slavery in the supply chain. The NCA will also highlight the [guidance set out by the Home Office](#) on identifying and supporting victims of Modern Slavery and reporting Modern Slavery as a first responder.

Additionally, the NCA has built in consideration of Social Value within the procurement process. All commercial specialists have mandatory training on this, which ensures that each procurement has a relevant social value criteria with a minimum weighting of 10% of the total score. This considers key inclusion issues including addressing economic inequality and well-being and inclusion.

The NCA is committed to learning from experts, other government departments and sharing good practice. The NCA will utilise existing networks across government and learn from wider policy and academic institutions and is an active member of the cross government group facilitated by the Home Office on reducing the risk of Modern Slavery in the supply chain.

7. Risk assessment and due diligence

The NCA will utilise the [Risk Assessment Toolkit](#) to ascertain the risk of Modern Slavery with a particular focus on Gold and Silver contracts which are usually high spend and high complexity and where the risk of Modern Slavery is the highest. This will be informed by the knowledge that Modern Slavery is disproportionately more likely in some sectors and some countries where labour laws are weaker. We will support suppliers where risk is the highest to take positive steps to reduce risk. This may include reviewing who they sub contract procurement activity to, taking greater steps to protect workers and highlighting how to report incidences of Modern Slavery.

We will report annually on the KPIs including the number of contracts assessed for the risk of Modern Slavery and the take up of the training. We will ensure there is both awareness about identifying the risk of Modern Slavery within the NCA and its suppliers; and accountability if suppliers do not take steps to reduce the risk. This will include implementing simple and straightforward routes for NCA Officers and suppliers to report evidence of non-compliance to Modern Slavery policies and agreements. This will be through establishing a dedicated and secure email address, as well as utilising existing channels such as Professional Standards and the Raising a Concern and Whistleblowing Procedure. Given NCA's strategic role in tackling Modern Slavery, the responsibility to



identify incidences and report non-compliance will be for everyone across the organisation.

The highest risks of people falling victim to Modern Slavery in our UK-based supply chain include construction workers and those undertaking service contracts in sectors such as cleaning, catering and security, where low pay, migrant labour and/or indirect labour are present.

In regards to the global supply chain, the highest risks of poor working conditions and abuse of human rights are associated with the production and manufacture of electronic equipment, textiles and construction materials. The mining and extraction of conflict materials such as copper, lithium, nickel and cadmium, used in the production of batteries for electric vehicles are also of increasing concern.

Where incidences of Modern Slavery are highlighted, proportionate and appropriate actions will be undertaken. Reporting via the dedicated email may feature both 'live' cases of suspected Modern Slavery or incidences after the supply chain has identified and managed the event. In all cases, it is important to ensure support to potential victims. Clear guidance will be produced to report incidences on Modern Slavery, including calling 101 upon identification or 999 in an emergency where there is an immediate danger or risk to life, followed by internal reporting.

All commercial contracts will include a clause requiring suppliers to assess the risk of Modern Slavery in their supply chains. There will be a responsibility placed upon suppliers to the NCA that Modern Slavery will not be prevalent within the supply chain. Should incidences of potential Modern Slavery in a supplier's supply chain be reported, suppliers will have a responsibility to tackle the issue head on. If a local response seems inadequate and the local company seems unable to address coercion, threat, abuse and exploitation of workers, then the NCA will provide that supplier with further support and guidance to tackle the issue. This approach will include supplying further educational resources, such as the NCA Modern Slavery e-learning packages, as well as externally produced material. If after receiving support, the supplier is not taking the issue seriously, the NCA will take steps to end the commercial relationship with that supplier.

NCA Officers have a responsibility to undertake due diligence checks for MSHT during their daily operational activity. The Agency will continue to find ways to help all Officers stay aware and alert, such as by promoting relevant Apps and information sources that can help NCA Officers identify cases of exploitation and report incidences of Modern Slavery.

8. Training and awareness raising

Increasing knowledge and capability of commercial specialists and contract managers is a critical part of the NCA's work to conduct effective Modern Slavery due diligence on our supply chains. Training on Modern Slavery in the supply



chain is mandatory for all commercial specialists and this will be further promoted to all Officers who engage in procurement activity.

As part of the launch of our Modern Slavery Statement we will have a programme of internal communication and training.

The NCA will also publicise other training opportunities such as the [Modern Slavery Procurement Guidance](#) and the [Government Commercial Function training](#) for public sector staff via the intranet and other internal communication channels.

Through these different training opportunities learners can:

- recognise how Modern Slavery can manifest in supply chains;
- spot Modern Slavery risks in procurement and critically interrogate the assurances suppliers provide (such as social audits);
- drive improvements in Modern Slavery due diligence to create better outcomes for workers; and
- enforce and manage the NCA Modern Slavery policy within the supply chain.

Additionally, the mandatory Social Value training workshops to commercial specialists will include a component on Modern Slavery criteria. All of the NCA Chartered Institute of Procurement and Supply (CIPS) qualified specialists undertake the Code of Ethics training annually.

We recognise that all Officers will make purchases on behalf of the NCA, whether through expense claims or smaller ad-hoc purchases; therefore it is important that the NCA works towards all Officers receiving Modern Slavery awareness training so that they can make more informed consumer choices.

9. Goals and Key Performance Indicators (KPIs)

This section lists all of the goals and KPIs listed in this statement.

We have set these goals to ensure we make year-on-year progress and established key performance indicators to measure the effectiveness of our efforts to protect workers from exploitation.

Goals and KPIs for 2022-23

Commercial activity:

1. Develop standardised processes to ensure that Modern Slavery and ethical sourcing risks are assessed at the tender stage of all contracts, especially those within significant or high risk sectors, particularly construction, electronics and uniforms. The risk assessment toolkit will also consider countries where the risk of Modern Slavery is increased.



2. Continue to roll out training to key commercial specialists who manage contracts identified with a high area risk of Modern Slavery or ethical sourcing.

Governance and partnership:

3. Consideration of Modern Slavery to be part of the criteria for any Gold level contract.
4. Bespoke training and presentations to senior colleagues who sit on assurance boards. This will enable members to make informed decisions on the risk of Modern Slavery within each commercial case and contribute to mitigations to continuously reduce and monitor the risk.

Policy:

5. Share good practice from public bodies via cross departmental networks and academics to ensure continued improvement and increase capability across the Agency.
6. Update relevant internal policies and processes to ensure standardisation of content regarding MSHT and establish accessible policies for all NCA Officers.

Risk assessment and due diligence:

7. Work with the key suppliers assessed to be medium and high-risk to eradicate the risks of Modern Slavery in their organisations and supply chains.
8. Ensure relevant suppliers undertake the Home Office Modern Slavery Assessment Toolkit to allow them to map their supply chains, develop improvement plans and implement responsible recruitment and purchasing practices.
9. Set up a dedicated email address to make it easier for NCA Officers and suppliers to report non-compliance to Modern Slavery policy and our aims. This will be a means to support and guide both Officers and suppliers, allowing all to learn and take actions to reduce the risk of non-compliance.

Training and communication:

10. Deliver a workshop on understanding and reducing the risk of Modern Slavery within the supply chain as part of Commercial Awareness Week.
11. Provide clear guidance to the wider internal organisation on how to reduce the risk of engaging with non-compliant suppliers and share relevant resources such as the Safer Car Wash App.
12. It will be mandatory for all commercial specialists to have completed Modern Slavery training.



Signatories

This statement has been reviewed and is approved by the Director General of the NCA. This statement is sponsored by the Director of Corporate Business Services and the Modern Slavery Lead in Threat Leadership and will be reviewed annually.

Graeme Biggar CBE Director General	8.12.22
Jacqui Smillie Director CBS/Chief Financial Officer	4.11.22
Chris Farrimond Threat Leadership	22.11.22