

## Modern Slavery and Human Trafficking Statement

### **1. Introduction**

- 1.1. This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the Act) and sets out the steps the National Autistic Society (the charity) has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any other part of our business.
- 1.2. This statement covers the activities of our wholly owned subsidiaries:
  - NAS Services Ltd
  - Autism UK Ltd
  - NAS Academies Trust
- 1.3. This statement also covers the activities of programmes we run that do not exist as legal entities or subsidiaries but may be viewed as such by the public:
  - Autism Education Trust
  - Cullum Centre
  - Lorna Wing Centre
  - Local branches
- 1.4. We are committed to improving our practices to combat slavery and human trafficking.

### **2. Our Organisational Structure**

- 2.1. The National Autistic Society is a large disability charity (charity number 01205298) and company limited by guarantee
- 2.2. The charity provides direct support through provision of information and advice, peer support network, education, social care and diagnostic services.
- 2.3. The charity creates systemic change by influencing public policy and public attitudes, training professionals working in public services and accrediting services.
- 2.4. The charity employs staff and relies on volunteers to deliver its activities and raises income through voluntary and commercial sources.
- 2.5. The charity has services and offices in England, Wales, Scotland and Northern Ireland
- 2.6. The charity has an annual turnover of approximately £100 million
- 2.7. The charity's supply chain includes the following industries:
  - cleaning services
  - maintenance
  - courier services
  - conference suppliers
  - recruitment agencies
  - IT suppliers

### **3. Our Policies on Slavery and Human Trafficking**

- 3.1. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.
- 3.2. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.
- 3.3. The charity ensures that all employees are aware of the Anti-Slavery Policy as well as our Whistleblowing Policy and the Fairness and Dignity at Work Policy
- 3.4. All employees are paid at least the minimum wage in their local jurisdiction

### **4. Due Diligence and Risk Management**

- 4.1. Wherever possible we look to establish sound and longstanding relationships with suppliers who understand and share our values
- 4.2. We work to the highest professional standards and comply with all laws, regulations and rules relevant to our charity and business operations and we expect the same from our suppliers and partners.
- 4.3. As part of our initiative to identify and mitigate risk we ensure that all recruitment checks are completed including right to work checks, reference checks and, where relevant,

disclosure checks (DBS, Access NI and PVG). These checks are carried out for both contracted employees and agency staff.

4.4. We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and/or human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Support and protect whistle blowers.

## **5. Key performance indicators to measure effectiveness of steps being taken**

5.1. We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Regular audits of Agency employees training and checks
- HR file audits to ensure that all safeguarding and recruitment checks have been completed. (DBS, PVG, References, Right to Work)
- Spot checks on suppliers including ensuring they have a Modern Slavery and Human Trafficking statement on their websites

## **6. Training on modern slavery and trafficking**

6.1. All employees are required to complete various e-learning training modules during their induction period including modules on our whistleblowing process, Fairness and Dignity in the Workplace and Diversity

## **7. Our Future Plans**

- 7.1. We are planning to increase our training offer to employees to include further training on how vulnerable people, including autistic adults and children, may be coerced into situations of modern slavery
- 7.2. We are expanding our whistleblowing process to increase staff confidence in the process and enable a greater level of engagement from frontline staff
- 7.3. We are exploring how to improve our current risk assessment of our supply chains

**Confirmed by the Board of the NAS**

**10 December 2020**