

Modern Slavery and Human Trafficking Statement October 2024

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 that 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 the Charity and its wholly owned subsidiaries:
- NAS Services Ltd; and
 - Autism UK Ltd
- 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; and
 - Local branches
- 1.4 We are committed to improving our practices to combat slavery and human trafficking.
- 1.5 References to "we" and "our" in paragraphs 3 to 7 of this statement should be read to be references to the Charity and all legal and non-legal entities set out at paragraph 1.

2. Our Organisational Structure

- 2.1 The Charity is a large disability charity (charity number 01205298) and is a private company limited by guarantee and registered in England.
- 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;

- professional services firms; and
- IT suppliers

2.8 NAS Services Ltd is a subsidiary of the Charity through which it delivers the majority of its welfare and education services.

2.9 Autism UK Ltd is a subsidiary of the Charity through which it trades Christmas cards and sponsors conferences and events.

3. **Our policies in relation to the Modern Slavery Act 2015**

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 Statement 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 Statement as well as other 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 including our Whistleblowing Policy, the Fairness and Dignity at Work Policy, Recruitment & Selection, Code of Conduct.

3.4 All employees are paid at least the national minimum wage that is applicable 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 our directly contracted employees and agency staff. The temporary staffing agency that we use undertake due diligence checks at the point of onboarding agencies that are joining their panel. As part of these checks, the staffing agency requires sight of their modern slavery statements and these are checked on an ongoing basis as part of continuing due diligence.

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; and
- 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); and
 - Spot checks on suppliers including ensuring they have a modern slavery and human trafficking statement on their website(s).

6. Training on modern slavery and trafficking

- 6.1 All employees are required to complete various e-learning training modules during their induction period and on an ongoing basis 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 have expanded our whistleblowing process to increase staff confidence in the process and enable a greater level of engagement from frontline staff.

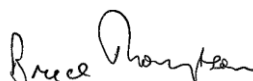
- 7.3 We are exploring how to improve our current risk assessment of our supply chains.

- 7.4 Since the last statement:

7.4.1 the Charity has introduced a neutral vendor model for the supply of agency staff. The supplier undertakes rigorous checks to ensure full compliance with relevant legislation; and

7.4.2 - the Charity has also introduced applicant tracking technology to achieve consistent and efficient recruitment practices. The Charity has also fully automated all pre-employment checks including right to work (where permitted), social media, DBS, and references.

Signed by Bruce Thompson



Company Secretary

24th October 2024

Approved by the Board of the National Autistic Society on 10 October 2024