



Modern Slavery and Human Trafficking Statement

Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 01 December 2021 to 31 March 2022.

The statement sets down NATIONAL CRC GROUP LIMITED's (a company incorporated in England and Wales, (Registered No.13027672) with its Registered Office at City of London Corporation, Guildhall, Guildhall Yard, London, England, EC2P 2EJ) commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational structure and supply chains

This statement covers the business activities of NATIONAL CRC GROUP LIMITED which are as follows:

National CRC Group Limited is an organisation that supports the nine Regional Cyber Resilience Centres affiliated to each of the Regional Police forces in England and Wales, which Centres deliver strategic partnerships and innovation to improve cyber resilience across supply chains and the SME community in all sectors and provides cyber resilience and related services to the customers of the said Regional Cyber Resilience Centres and to all other businesses in the wider supply chain.

The Company currently operates in the following countries:

England and Wales.

The following is the process by which the Company assesses whether particular activities or countries are high risk in relation to modern slavery or human trafficking:

National Decision Model Risk Assessment

Information – gather information

The Company will define what is happening or has happened and clarify matters relating to any initial information.

- What is happening?
- What do I know so far?

- What do I not know?
- What further information do I want/need at this moment?

Assessment – assess threat and risk and develop a working strategy

The Company will assess the situation, including any specific threat, the risk of harm and the potential for benefits. Among other things decision makers will consider the objectives of preventing discrimination, promoting good relations and fostering equal opportunities.

Develop a working strategy to guide subsequent stages by asking:

- Do I need to take action immediately?
- Do I need to seek more information?
- What could go wrong (and what could go well)?
- What is causing the situation?
- How probable is the risk of harm?
- How serious would it be?
- Is that level of risk acceptable?
- Is this a situation for the police alone to deal with?
- Am I the appropriate person to deal with this?
- What am I trying to achieve?
- Will my action resolve the situation?

Powers and policy – consider powers and policy

The company will consider the powers, policies and legislation that could apply in this particular situation.

Decision makers could ask themselves:

- What police powers might be required?
- Is there any national guidance covering this type of situation?
- Do any local organisational policies or guidelines apply?
- What legislation might apply?
- Is there any research evidence?

It may be reasonable to act outside policy as long as there is a good rationale for doing so.

Options – identify options and contingencies

The company will consider the different ways to make a particular decision (or resolve a situation) with the least risk of harm.

Decision makers should consider:

- the options that are open
- the immediacy of any threat
- the limits of information to hand
- the amount of time available
- their own knowledge, experience and skills
- the impact of potential action on the situation
- what action to take if things do not happen as anticipated

If decision makers have to account for their decisions, will they be able to say they were:

- proportionate, legitimate, necessary and ethical?
- reasonable in the circumstances facing them at the time?

Action and review – take action and review what happened

Action

Respond:

- Implement the option you have selected.
- Does anyone else need to know what you have decided?

Record:

- Record what you did and why.

Monitor:

- What happened as a result of your decision?
- Was it what you wanted or expected to happen?

If the incident is continuing, go through the process again as necessary.

Review

If the incident is over, review your decisions. What lessons can you take from how things turned out and what might you do differently next time?

Decision making principles

Accountability – You are answerable for your decisions, actions and omissions

Fairness – You treat people fairly

Honesty – You are truthful and trustworthy

Integrity – You always do the right thing

Leadership – You lead by good example

Objectivity – You make choices on evidence and your best professional judgement

Openness – You are open and transparent in your actions and decisions

Respect – You treat everyone with respect

Selflessness – You act in the public interest

Responsibility for the Company's anti-slavery initiatives is as follows:

Policies: CEO Nick Bell is responsible for creating and reviewing policies. The process by which policies are developed is reviewing best practice and adapting to the needs of the Company.

Risk assessments: CEO Nick Bell is responsible for risk assessments in respect of human rights and modern slavery.

Due diligence: CEO Nick Bell is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all new senior staff and management to watch online video within 1 month of start date.

Home Office - Modern Slavery is closer than you think: Understanding Modern Slavery and Human Trafficking

[Modern Slavery is closer than you think: Understanding Modern Slavery and Human Trafficking](#)

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- 2.1 **Whistleblowing policy** - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- 2.2 **Company Code of Conduct** - The Code of Conduct sets down the actions and behaviour expected of employees when representing the Company.
- 2.3 **Corporate Social Responsibility (CSR) Policy** - The Company's CSR policy summarises how we work responsibly with suppliers and local communities.

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners, evaluating the modern slavery and human trafficking risks of each new supplier and invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

Performance indicators

The Company uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including requiring all new senior staff and management to watch online video within 1 month of start date.

Home Office - Modern Slavery is closer than you think: Understanding Modern Slavery and Human Trafficking

[Modern Slavery is closer than you think: Understanding Modern Slavery and Human Trafficking](#)

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Board of Directors endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Nick Bell

Position: Chief Executive Officer

Date: 16 Nov 2021

Signature: 