



National Audit Office

The National Audit Office (NAO) modern slavery and human trafficking statement

2021-22

Introduction

This Statement has been produced in accordance with the Modern Slavery Act 2015. The Statement details the steps that the NAO has taken during the 2021-22 financial year to prevent modern slavery and human trafficking in our supply chains or the NAO's business.

Organisation structure, business and supply chains

The NAO is the UK's independent public spending watchdog. Our work supports Parliament in holding government to account for the way public money is spent and to drive improvements in the way public services are delivered. We do this through our high-quality audits of the financial statements and value-for-money studies into the economy, efficiency and effectiveness with which public bodies have used their resources.

We are independent of government. The head of the NAO is the Comptroller and Auditor General (C&AG) – Gareth Davies – and is an Officer of the House of Commons and a Crown appointee.

As well as providing audit assurance on government accounts, the NAO's work leads to a positive financial impact through reduced costs, improved service delivery, or other benefits to citizens. In the calendar year ending 31 December 2021 we reported financial impacts of some £874 million. Our work also leads to other sustained improvements in the UK's public services, which cannot always be directly quantified in financial terms. There are examples of these set out in our Annual Report and Accounts.

The NAO is funded by money voted to it by Parliament and by fees levied on its client base for some of the services it provides. Parliament sets our budget, scrutinises our performance and appoints our external auditors through a House of Commons committee called the Public Accounts Commission. Our governance arrangements were established under the Budget Responsibility and National Audit Act 2011 and reflect our unique statutory position by balancing Parliament's wish for independent oversight of the NAO's operations, while preserving the C&AG's discretion in the performance of his statutory audit responsibilities.

The average number of people employed by the NAO during 2021-22 was 910. The majority of NAO employees are engaged on open-ended employment contracts. Employees on fixed-term contracts are eligible for the same benefits as permanent employees. We have robust HR policies and processes, which are applied consistently across our office locations and which aim to comply with the spirit as well as the letter of relevant legislation.

Around 70% of the NAO's cost base is for the salaries and related costs of staff who perform our audit and assurance work. The NAO recruits around 70–80 graduates and school-leavers each year and supports them in gaining a professional accountancy qualification.

The remaining 30% of the NAO's budget is mostly spent on the purchase of goods and services. This included audit services purchased from professional accountancy firms, IT support and training to assist the delivery of audit projects, and the cost of maintaining our London and Newcastle offices. In these instances we are spending money with organisations or a supply chain we do not directly oversee. Such expenditure is incurred in compliance with our procurement policy, which requires a competitive process and the use of government frameworks where these are available.

Modern slavery and human trafficking policy

We have a zero-tolerance policy to modern slavery and human trafficking. We are committed to ensuring that it does not exist in our supply chain or in any part of our business. If we become aware that one of our suppliers is accepting of modern slavery or human trafficking in their business or supply chain, we will exercise our rights to cancel the relevant contract/s and notify the appropriate authorities.

Due diligence processes, risk assessment and steps taken

As a Parliamentary body providing professional assurance services, we consider the risk of modern slavery and human trafficking in our directly managed business activities and the first line of our supply chain to be low. Each year we assess our operations and our supply chain for areas where practices of modern slavery or human trafficking may occur and we have concluded we have preventive actions in place. These are summarised in the table on pages 4 and 5.

Operations	Preventative actions
Direct appointment of people	
<p>The NAO directly employs people to carry out its audit and assurance work and provide business support services.</p> <p>From time to time, the NAO also has people seconded in from other organisations.</p>	<p>The NAO has a clearly defined set of HR policies and processes which set out the rights and entitlements of its people and are aligned closely to those recommended across the civil service. The NAO consults its staff before making any changes to these policies. There is an active trade union and the NAO works closely with the union in setting policies. All NAO employees are subject to eligibility work checks before commencing employment.</p> <p>The NAO is confident there are no instances of modern slavery or human trafficking among its employees, and that there is an adequate set of policies and procedures to prevent this. There are also nominated individuals (Dignity at Work leads) across the organisation who, outside of direct line management responsibilities, provide a confidential support service to people who are experiencing Dignity at Work issues. This provides an additional channel for raising issues of inappropriate behaviour or treatment – for example, if an employee felt uncomfortable raising such matters through the usual central HR procedure. All staff also have access to an Employee Assistance Programme, which operates independently of the NAO and provides support and advice to staff on a wide range of issues. This includes issues unrelated to their employment.</p> <p>Where we have people working for us on inward secondments, we carry out due diligence before these individuals join us, and also provide them with the same support and duty of care that we provide to our own employees when they are with us.</p>
Indirect appointment of people	
<p>The NAO may supplement the number of people it directly employs by entering into contracts with third parties for the use of temporary staff and contractors. These are often used for assignments which last for short and fixed periods of time.</p> <p>This could also include engagements with accountancy firms who provide resources to supplement NAO's staffing needs as necessary by performing audit work on our behalf.</p> <p>The management of our London property also includes activities under contract, such as the provision of personnel for office services who work on site and under NAO supervision.</p>	<p>The NAO operates a formal procurement policy for entering into contracts for goods and services. This includes making use of public sector frameworks where they are available.</p> <p>Periodically, the NAO supplements its workforce with temporary staff contracted from recruitment agencies. These contracts are mostly selected from public sector procurement frameworks under which the NAO can confirm that the rates of pay received by the worker are in line with, or above, the UK minimum wage. The NAO also complies fully with the Agency Workers Regulations 2010 (AWR), which requires that any agency worker who completes a 12-week qualifying period in the same role receives the same basic working and employment conditions as permanent NAO staff.</p> <p>The NAO has significant contracts for the management and provision of security services to its property, engineering, cleaning and other office services. The NAO has specified in the contracts that all people working on NAO contracts must be paid the Living Wage. The pay rates are set out in the contract and, as an open book contract, the NAO verifies that payments to these people are made in line with the agreed rates following the end of each financial year (the last review was in July 2021 with the next one planned for July 2022).</p>

Operations	Preventative actions
Purchase of goods and services from suppliers who employ people in their own supply chain.	<p>We purchase a range of goods and services to run our office and our audit practice – for example, IT-related equipment and services, training activities and the cost of utilities to run our London and Newcastle offices.</p> <p>These are often small-value and frequent purchases and it is not practical to investigate all supply chains in detail. However, on all tenders that are advertised through Contracts Finder and Find a Tender Service, winning bidders are requested to send a copy of their Modern Slavery Statement if they have a turnover of £36 million or more. For framework procurement, the statement is already requested by the framework owner; however, the NAO's Central Procurement Team ensures that these statements are recorded on an annual basis as part of the contract management annual checks.</p> <p>The NAO can exclude any supplier where issues around modern slavery or human trafficking are identified as part of a procurement exercise. However, we would give the supplier an opportunity to provide evidence of the circumstances and any remedial action that has since taken place. We would take these factors into account when making our final award decision.</p>

Raising awareness

We have established a Contract Management Group to bring together all staff who are involved in contract management, and the group meets quarterly to share best practice and common issues. This group is a forum through which we are able to and do raise awareness of the risks associated with modern slavery and human trafficking and how to identify risks within our supply chain, as well as provide group members with the confidence to challenge areas of concern.

For other staff groups, based on our assessment, we believe the risks of staff engaging or encountering practices of modern slavery and human trafficking are low. We have therefore deemed it unnecessary to provide training to all our staff. However, we are proactive in drawing the attention of all NAO staff to our published Modern Slavery and Human Trafficking Statement by promoting it on our internal intranet. This reminds staff of our zero-tolerance policy on modern slavery and human trafficking and helps to ensure NAO staff remain constantly vigilant and alert to any poor practices in our suppliers.

Effectiveness in preventing modern slavery and human trafficking

The NAO's strategic and operational risks are reviewed and reported to the Executive Team each month and included as a regular item on the NAO Board meeting agenda. A full report on our risk management process and associated actions is given in the Governance Statement within our Annual Report and Accounts.

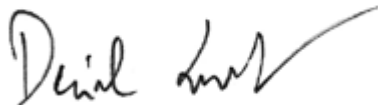
The annual internal audit work programme is designed using a risk-based methodology. Internal audit has completed analytical reviews and limited regularity testing in addition to cyclical reviews of HR and procurement audits. The internal audit work in 2021-22 did not identify any issues or concerns relating to instances of modern slavery and human trafficking.

In the next financial year, the NAO's Central Procurement Team plans to implement further checks on our existing supply chain. We have identified critical and strategic contracts and we will check for ongoing assurance that suppliers regularly publish and keep their Modern Slavery Statements up to date. These compliance checks will form a part of a suite of contract management measures undertaken by contract managers and will be recorded on the NAO's Contract Management System.

We consider that the NAO's risk management process provides a robust mechanism to ensure the prompt escalation of issues relating to modern slavery and human trafficking should they arise. Taken together with the other measures described in this Statement, we believe that the preventive steps we have taken are appropriate and proportionate to the risk we face currently.

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the NAO's Modern Slavery and Human Trafficking Statement for the financial year ending 31 March 2022.

This Statement has been approved by the NAO Board at its meeting on 17 June 2022.



Daniel Lambauer
Executive Director, Strategy and Resources

The material featured in this document is subject to National Audit Office (NAO) copyright. The material may be copied or reproduced for non-commercial purposes only, namely reproduction for research, private study or for limited internal circulation within an organisation for the purpose of review.

Copying for non-commercial purposes is subject to the material being accompanied by a sufficient acknowledgement, reproduced accurately, and not being used in a misleading context. To reproduce NAO copyright material for any other use, you must contact copyright@nao.org.uk. Please tell us who you are, the organisation you represent (if any) and how and why you wish to use our material. Please include your full contact details: name, address, telephone number and email.

Please note that the material featured in this document may not be reproduced for commercial gain without the NAO's express and direct permission and that the NAO reserves its right to pursue copyright infringement proceedings against individuals or companies who reproduce material for commercial gain without our permission.

Links to external websites were valid at the time of publication of this report. The National Audit Office is not responsible for the future validity of the links.

072090 07/22 NAO



National Audit Office

