

# Modern Slavery Statement 15/16

## Introduction

This statement sets out Focused's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 6 April 2015 to 5 April 2016.

We recognise that we have a responsibility to take a robust approach to slavery and human trafficking. Focused operates a zero tolerance approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

## Organisational structure and supply chains

This statement covers the activities of Focused Consulting, 'Focused.'

- Focused is referred to commonly in the industry as an 'Umbrella' company. We employ large numbers of workers under an overarching contract of employment to work on temporary assignments for end clients/users. The assignments are usually sourced by recruitment businesses. Focused is responsible for the employment and payroll of these workers.
- The supply chain usually runs as follows:
  - The client contacts a recruitment business to source a worker to assist with its work load. A contract for services is normally signed between the two businesses.
  - The recruitment business recommends that the worker is employed by Focused, alternatively, the worker advises the recruitment business that it wishes to be employed by Focused.
  - Focused and the recruitment business agree and sign a contract for services.
  - Focused employs the worker under a contract for employment.

## Countries of operation and supply

Focused currently operates exclusively in the UK. Workers may be asked to work abroad on assignments with their clients. Our insurance covers this scenario. Focused's head office is based in Altrincham and our workers are placed all over the country.

## Responsibility

The Legal Director, Julian Ball, is responsible for the organisation's anti-slavery initiatives, with the support of the Compliance Manager, Alison Roberts. Their duties involve:

- Policies: The review and implementation of all policies relating to modern slavery risks.
- Risk assessments: The identification of risk and steps needed to mitigate the risk of modern day slavery.
- Investigations/due diligence: To investigate and take due diligence steps in relation to known or suspected instances of slavery and human trafficking.
- Training: To raise awareness of modern day slavery risks.

### **Due diligence processes**

We have taken the following steps to prevent slavery and human trafficking in its business and supply chain:

- We have developed a Modern Slavery Policy which 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. Our Modern Slavery Policy is available on request.
- We will not support or deal with any businesses knowingly involved in slavery or human trafficking. The agencies we use for the supply of labour are reputable agencies and we expect them to follow the same anti-slavery policies as we do. We follow a strict agency/client on-boarding process as follows:
  - Completion of our New Agency/Client Payroll Form. Available on request.
  - Check on the web domain.
  - Check on the Company and VAT numbers.
  - Credit check.
  - Ensure that the company accounts have been filed.
  - Incorporation check.
- We adhere to the national minimum wage (nmw) or national living wage (nlw) as appropriate. Our systems restrict us from processing a payment below the nmw/nlw and our employment contract with the worker also reiterates this point.

### **The effectiveness of our work**

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking in the year 2016/2017:

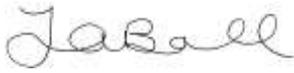
- Conduct further risk assessments to determine which part of our business and which of our suppliers are most at risk of modern slavery, so that our efforts can be focused on these areas.
- Supply chain: as part of our due diligence procedures, we will introduce contractual provisions for our suppliers to confirm their adherence to this policy.
- Disciplinary: we will amend and develop our disciplinary procedures to incorporate the Modern Slavery Policy.

- Training: We will incorporate the Modern Slavery Policy into the joining process, such that the employee will be asked to read and acknowledge understanding of the Policy.
- Develop a whistleblowing procedure: We want to encourage our employees to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The whistleblowing procedure should be designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns should be able to contact the Compliance Manager on a confidential basis.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Focused's slavery and human trafficking statement for the financial year ending 5<sup>th</sup> April 2016. The statement has been approved by the director, who will review and update it annually.

Focused Consulting

Director's name: Julian Ball

Signature: 

Date: 6<sup>th</sup> April 2016