

Modern Slavery Statement 16/17

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 2016 to 5 April 2017.

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.' In our industry, Focused is commonly referred to as an 'Umbrella' company. Routinely, when an employment business fills a temporary vacancy for a client, the employment business will either payroll the individual directly or refer him/her to a preferred supplier. We are preferred/approved suppliers for many recruitment businesses in the UK. Once the individual has been referred to us, we employ him/her to work on temporary assignments for end clients/users. In some scenarios, individuals will also contact us directly, asking for our employment while they carry out a temporary assignment(s) for a client.

The supply chain usually runs as follows:

- The client contacts a recruitment business to source an individual to assist with its work load. A contract for services is normally signed between the two businesses.
- The recruitment business refers that individual to Focused or alternatively, the individual 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 individual on a contract of employment. This is the end of the supply chain.
- In the alternative, an individual will contact us directly and we will arrange and sign a contract for services with the client for the supply of the individual to the client. This is the end of the supply chain.

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 and HR Manager, Clare Baker. 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 recruitment businesses that we work with are reputable businesses 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.
- We have developed a whistle blowing policy to encourage our employees, officers or sub-contractors 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 was designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, officers or sub-contractors or others who have concerns can 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 5th April 2017. The statement has been approved by the director, who will review and update it annually.

Focused Consulting

Director's name: Julian Ball

Signature: 

Date: 6th April 2017