

# Modern Slavery Statement 17/18

## 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 2017 to 5 April 2018.

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 is a single statement to cover the activities of Focused Consulting Limited which is under the holding company, PayStream My Max Holdings Limited (company number 07598949). We refer Focused Consulting Limited as "Focused" in this statement.

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 Umbrella employees 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 and human trafficking 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.
- Measure success: To measure the effectiveness of our due diligence to ensure that slavery and human trafficking is not taking place in the business or supply chains.

- Training: To raise awareness of modern day slavery risks.

## Due diligence processes and steps

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

- We have updated our 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) / national living wage (NLW). Our systems restrict us from processing a payment below the NMW/NLW and our employment contract with the worker also reiterates this point.
- Following new case law concerning “sleeping-in” arrangements in the care sector, we carried out additional research to ensure we were meeting NMW/NLW requirements in lower paid sectors. We contacted our agencies to check whether any of the following apply to our workers:
  - Sleep ins (on call, in the workplace): whether the agency pays a flat rate in respect of sleep-in shifts (as opposed to paying NMW/NLW);

- Whether workers were expected to arrive pre-shift or stay post-shift for any reason and if so, whether this counted towards working time.
- Pay deductions: if workers were required to buy and wear a uniform.
- Overtime: for those on day rates/session rates/project work rates close to the NMW/NLW, whether the agency pays overtime to the workers.
- Living accommodation: whether workers receive payments in respect of living accommodation.
- We considered whether we needed daily averaging agreements for any workers on low day rates or working piece work.
- 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.
- We have incorporated the Modern Slavery Policy into the Focused joining process. Each Umbrella employee is asked to read and acknowledge understanding of the Policy. A copy of the Policy is available on the employee's portal.

## 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 2018/2019:

- Continue to risk assess the business and focus our efforts in those departments most of risk of being used for modern slavery, particularly around NMW/NLW.
- Disciplinary: we will amend and develop our disciplinary procedures to incorporate the Modern Slavery Policy. We did not achieve this in 2017/2018.

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

Limited Director's name: Julian Ball

Signature: 

Date: 6th April 2018

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