

# Modern Slavery Statement 22/23

## Introduction

This statement sets out Focused 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 2022 to 5 April 2023.

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 Limited, which we refer to 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 will contact and verify a suitably qualified and/or experienced person to fulfil the client’s vacancy.
- The recruitment business refers that individual to Focused or alternatively, the individual advises the recruitment business that he/she wishes to be employed by Focused.
- Focused and the recruitment business sign a contract for services for the supply of the individual to the recruiter’s client.
- 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. The Focused head office is based in Altrincham and our Umbrella employees are placed all over the country.

## Responsibility

The Legal Director is responsible for the organisation's anti-slavery initiatives, with the support of the Legal Manager, Regulatory Compliance Manager, and HR Director. 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 and evaluate 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: continue 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 regularly review 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 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 continue to monitor key case law on this point since an application to a higher court may overrule current guidance on this area.
- 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 Legal 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.
  - New legislation was introduced in April 2019 that required employers to show hours on payslips where the pay varies by the amount of time worked. We have made system changes to facilitate this requirement and have put in place policies and processes to ensure we obtain and record accurate information on hours worked.
  - Focused is committed to making a meaningful contribution to the communities where we work and live. It aligns to our core values, specifically Integrity, in this context doing the right thing because it is the right thing to do. We have established an ESG team to ensure we exert a positive impact on our community and in the relationship with our employees; adopt and maintain good internal practices and controls to ensure we make effective decisions that are compliant and meet the needs of all our stakeholders and also consider how we can take care of our environment.
  - We carry out periodic checks on shared occupancy since we are aware that a high number of individuals living in the same accommodation can in some instances point towards modern slavery and/or trafficking.
  - We implemented changes required under the Good Work Plan which was published to improve transparency of pay and employment terms.
  - We, like many businesses, were affected by the impact of the Coronavirus. We introduced a furlough scheme under the Coronavirus Job Retention Scheme (CJRS) between April and July 2020 and committed to supporting as many employees as we could during this difficult time, even though it came at significant cost to us.

- Our disciplinary procedures incorporate potential breaches of our Modern Slavery Policy.
- We added a flag to our internal systems to highlight to us where multiple employee records have the same bank account details connected to them since multiple individuals using the same account can in some instances point towards modern slavery and/or trafficking. We are in the process of further developing this to make the system more dynamic and flag the matches as early as possible to us.
- We conduct checks on anyone requesting to use a third party's bank details to be paid for work completed, ensuring the relationship between our employee and the third party is legitimate and not at risk of falling under modern slavery.

## 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 2022/2023:

- 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 and our onboarding procedures.
- We will put system restrictions in place to flag multiple employees using the same bank account since multiple individuals using the same account can in some instances point towards modern slavery and/or trafficking.
- We will look to implement a spot check procedure on our supply chains, ensuring those we work with continue to comply with relevant legislation and are taking preventative measures to combat modern slavery.
- Continue to monitor the Good Work Plan in respect of other expected changes and work towards compliance where required.
- Monitor the proposed Modern Slavery Bill announced as part of the Queen's speech in May 2022 (which is expected to further strengthen the protection for victims of modern slavery and increase the accountability of companies in eradicating modern slavery from supply chains) and work towards compliance where required.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Focused slavery and human trafficking statement for the financial year ending 5th April 2021. The statement has been approved by the Legal Director, who will review and update it annually.

Director's name: Andrew Cleal

Signature:



Date: 27/06/2023

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