

# Modern Slavery Statement 24/25

## Introduction

This statement sets out Focused actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring there is no slavery or human trafficking in our business or supply chains. This statement relates to actions and activities during the financial year 6 April 2024 to 5 April 2025.

We recognise that we have a responsibility to take a robust approach to prevent 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 supply chains.

## Organisational structure and supply chains

This is a single statement to cover the activities of Focused Consulting Limited and Focused Payment Services Limited, which we refer to as “Focused” in this statement.

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

The supply chain usually runs as follows:

- The end 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 end client’s vacancy.
- The recruitment business refers that individual to Focused or alternatively, the individual advises the recruitment business that they wish to be employed or engaged by Focused.
- Focused and the recruitment business sign a contract for services for the supply of the individual to the client.
- Focused employs or otherwise engages the individual under a contract of employment, or contract for services, as applicable. 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 end client for the supply of the individual to the end client. This is the end of the supply chain.

## Countries of operation and supply

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

## Responsibility

The Legal Director is responsible for the organisation's anti-slavery initiatives, with the support of the Head of Legal, Head of Regulatory Compliance 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 modern day slavery.
- Investigations/due diligence: The investigation and implementation of due diligence steps in relation to known or suspected instances of slavery and human trafficking (including conducting audits as they deem necessary).
- Measurement and evaluation of success: Measuring the effectiveness of our due diligence to ensure that slavery and human trafficking is not taking place in the business or supply chains.
- Training: Continuing 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 our 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/end client on-boarding process as follows:
  - Completion of our New Agency/Client Payroll Form and confirmation of bank details. This form is available on request.
  - Check on the web domain.
  - Check on the Company and VAT numbers.
  - Credit check.
  - Check that the company accounts have been filed.
  - Incorporation check.
- We adhere at all times to the national minimum wage (NMW) / national living wage (NLW) requirements. Where applicable, our systems restrict us from processing a payment below the NMW/NLW and our contract with our employees 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 employees or 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 our employees or 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 our employees or 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 in relation to our employees or workers.
  - Living accommodation: whether our employees or workers receive payments in respect of living accommodation.
  - We considered whether we needed daily averaging agreements for any employees or workers on low day rates or working piece work.
- Where applicable, we monitor these key risk areas across all industries.
- We continue to monitor key case law and any updates to guidance on this area.
- New legislation was introduced in April 2019 that requires employers to show hours worked on payslips where the pay varies by the amount of time worked. We made system changes to facilitate this requirement and continue to maintain policies and processes to ensure we obtain and record accurate information on hours worked.

- We have developed a Whistleblowing policy to encourage our employees, workers, 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 is designed to make it easy for employees and workers to make disclosures, without fear of retaliation. Employees, workers, officers or sub-contractors or others who have concerns can contact the Head of Legal on a confidential basis on [legal.support@focusedgroup.co.uk](mailto:legal.support@focusedgroup.co.uk).
- We have incorporated our Modern Slavery Policy and Whistleblowing Policy into the Focused joining process. Each employee is asked to read and acknowledge understanding of these policies. A copy of the policies is also available on the employee's online portal and can be provided on request.
- 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 and workers; 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 implemented changes required under the Good Work Plan which was published in December 2018 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 have controls in place to highlight to us where multiple records relating to our employees or workers 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. At the end of the 2023/24 tax year, we introduced a monthly audit which allows us to investigate any instances of matching account details, such that we can assess each case and take any actions deemed necessary to address any modern slavery risk. Since October 2024, we have expanded this audit further to include checks of shared occupancy (where multiple employees appear to be living at the same address) 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 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 or worker and the third party is legitimate and not at risk of falling under modern slavery.
- In February 2024, we introduced a new learning and development platform to allow us to issue to staff and those working on our behalf, mandatory compliance training. The mandatory training rolled out to staff included a module on Modern Slavery, which was completed by all existing staff and new starters by June 2024. This training will be re-completed by each staff every two years. Managers have full visibility over their teams' learning through a real-time dashboard which helps us to keep track of compliance results and our completion rate. Our Internal Audit function independently monitor the completion rate of our company wide training throughout the year to ensure the completion of training is maintained.

## 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 2025/2026:

- Continue to risk assess the business and focus our efforts on those departments most of risk of being used for modern slavery, particularly around NMW/NLW and our onboarding procedures.
- Consider further periodic checks of procedures within our supply chains and review our standard contractual terms, to ensure those we work with continue to comply with relevant legislation, take preventative measures to combat modern slavery and our contractually bound to do so.
- Continue to monitor of any further legislative changes made in light of the Good Work Plan and work towards compliance where required.

- Monitor the report provided in November 2024 by a committee of the UK Parliament which recommended that the government: strengthen the enforcement of employment rights in the UK; introduce legislative requirements for businesses to undertake modern slavery due diligence in their supplier chains; impose further sanctions for those that do not and introduce import laws prohibiting goods associated with forced labour from entering the UK. Legislation aimed at strengthening enforcement in the Employment Rights Bill is already underway and the government has also confirmed its commitment to bolstering the enforcement of labour standards to protect migrant workers against exploitation.
- Legislation expected to be finalised in 2025 is likely to provide for a new Fair Work Agency which is expected to focus on safeguarding vulnerable workers in the UK. As such, we will continue to monitor these legislative changes and will continue to risk assess our worker standards (including our supply chains) as necessary to further strengthen the protection for victims of modern slavery and increase the accountability of companies within our supplier chain in eradicating modern slavery risk.

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 2024. The statement has been approved by the Legal Director, who will review and update it annually.

Director's name: Alison Roberts

Signature:



Date: 22/05/2025

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