



# Modern Slavery Statement

Including Human Trafficking.  
2019-20.

## **SUMMARY**

This statement outlines the company's approach to the prevention of modern slavery and human trafficking for staff, service users or our contractors/suppliers.

## **OWNER**

Antony Kildare, Managing Director

## **VERSION**

V1.0

## **DATE**

September 12, 2019

## **REVIEW DATE**

March 31, 2020

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Civic Offices, Bridge Street,  
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Company number 11293709

## Modern slavery statement

In accordance with the Modern Slavery Act 2015, BfFC makes the following statement regarding the steps it is taking in the financial year 2019/20 to ensure that Modern Slavery i.e. slavery and human trafficking is not taking place in any part of its own business or any of its suppliers.

### BfFC's policies on modern slavery

BfFC is committed to ensuring there is no Modern Slavery or Human Trafficking in any part of our company and in so far as possible, requiring our suppliers to hold corresponding ethos.

To identify and mitigate the risks of modern slavery and human trafficking in our own company, BfFC has established robust recruitment procedures as detailed in its Recruitment Policy. In addition, other external agencies providing staff are approved within governance frameworks used by Reading Borough Council, who supplies our recruitment service as part of a Service Level Agreement..

BfFC has a number of controls in place to ensure compliance with employment legislation:

Our Whistleblowing Policy encourages staff to disclose issues and concerns that are within the public interest and we have open channels for staff to talk to senior managers who will listen and talk to staff about any concerns;

Our Declaration of Interest form includes staff's personal responsibility to declare anything that may influence decisions, be that through the procurement or recruitment process. It references the Bribery Act 2010 with regard to indirect pressure to recruit or secure jobs and suppliers;

Our Children's social care teams play an integral part in ensuring that any current and potential risks are raised. Our service users and/or staff may show signs of abuse through modern slavery and we may be the first to notice these signs;

The company's codes of conduct makes clear to employees the actions and behaviours expected of them when representing the company. The company's values are imbedded into our policies, procedures and in the work that we do.

The company uses only specified, reputable employment agencies to source staff and RBC verifies the practices of any new agency it is using before accepting workers from that agency.

### Safeguarding

All new starters are required to undertake safeguarding training at corporate induction which includes the escalation and reporting of safeguarding concerns including modern slavery. Our Safeguarding Policy also references national and local policy/legislation in regards to modern slavery.

We have guidelines for managing allegations against staff including safeguarding concerns and work in partnership with statutory agencies to investigate any allegations made.

### Working with suppliers and risk assessments

Employee Code of Conduct - The company's code makes clear to employees the actions and behaviour expected of them when representing us. We strives to maintain the highest standards of employee conduct and ethical behaviour when commissioning or sourcing services.

We will ensure our suppliers and commissioned services have taken the necessary steps to ensure modern slavery is not taking place.

The commissioning, contracts and procurement team require all contractors of goods or services to have their own policy relating to working practices for modern slavery, or for evidence to be available to ensure their standards are in accordance with the Company's expectations. We request that our contractors ensure the same of their own supply chains. Our contractor selection questionnaire/due diligence forms include a requirement to comply with the Modern Slavery Act 2015. The team is committed to ensuring contractors' working practices are reviewed as part of the Company's contract monitoring framework. For agency workers, we use national government approved frameworks, including HCPC that regularly audits social workers.

## Due diligence

BFFC undertakes due diligence when considering taking on new suppliers, and regularly reviews existing suppliers. We identify and mitigate the risks of modern slavery and human trafficking within our company and suppliers by:

Purchasing through approved suppliers, within set rules for procurement

Building or establishing long standing relationships.

Upholding professional codes of conduct and practice relating to procurement and supply.

Seeking assurance through the tendering process that our suppliers and business partners are able to evidence their approach to modern slavery.

Auditing and monitoring agencies who provide staffing for us once a year to ensure they are able to provide evidence of qualifications and registration.

In addition, BFFC has a number of controls in place to ensure compliance with employment legislation. We propose to invoke sanctions against suppliers and staff who fail to improve their performance in line with an action plan including the termination of contracts.

## Training and Raising Awareness

Currently we have not undertaken any specific training of our staff with regard to modern slavery and human trafficking, however we incorporate modern slavery training within our safeguarding discussions and supervision.

Our procurement team are competent and qualified to Chartered Institute of Procurement and Supply standards therefore they understand how to identify and implement measures to reduce modern slavery within commissioned services.

Our children's social care staff are trained to identify children safeguarding risks and know how to escalate potential issues. Training is continuous.

We will develop a training programme to raise awareness and to understand the signs and symptoms of modern slavery and human trafficking.

We will also review relevant policies in line with changes to legislation and local policy.

## Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our organisation or suppliers if:

No reports are received from our staff, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

### Board approval

This statement has been approved by BFC's Directors who will review and update it annually.

**Antony Kildare**

Managing Director

Brighter Futures for Children

Sept 2019.