

Modern Slavery Policy

Addendum to Sunderland Council Modern Slavery Policy for Together for Children Sunderland Limited (TFC)

Together for Children Sunderland Limited (the Company) is committed to understanding and mitigating risks of slavery and human trafficking in its corporate activities and supply chains. This statement makes clear the Company's commitment to tackling modern slavery by setting out its actions to understand all potential modern slavery risks related to its business and the steps it has taken to aim to ensure that there is no slavery or human trafficking in its own business and its supply chains.

This statement is presented in compliance with the above-noted legislation and covers the following key elements:

- **The organisation's structure, its business, and its supply chains**

The Company is a private, limited by guarantee, company wholly owned by Sunderland City Council. It exists to provide high quality social care and education services and delivers these functions through a mixed economy of contracted and in-house services.

Key supply chain services relate to contracted out care services and the supply of back-office materials and functions. All formal procurement activity is undertaken on behalf of the Company by the Council under a Service Level Agreement.

- **Its policies in relation to slavery and human trafficking.**

The Company adheres to procurement best practice by buying in a Procurement service from the City Council. This gives the Company access to the Council's diligent supply chain checks and balances including vis-à-vis Modern Slavery. The Company has adopted the Council's Modern Slavery Policy which can be accessed as follows:

[Modern slavery and trafficking - Sunderland City Council](#)

"This statement covers direct employees of the Council (and its wholly owned companies) and services delivered on behalf of the Council by third party organisations, and in the supply chains."

- **Its due diligence processes in relation to slavery and human trafficking in its business and supply chains.**

The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk.

- **Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.**

The biggest risk to the Council, and hence the Company, in not being compliant with the Modern Slavery Act is recognised to be through the procurement of goods and services. The Council's Procurement Strategy (adopted by the Company) was updated to specifically refer to modern slavery and much activity in previous years has been focused on eliminating the procurement risks as much as possible. Procurement staff receive mandatory training and protocols have been subject to regular review.

- **The training and capacity building about slavery and human trafficking available to its staff.**

The Company will follow the Council which will continue to train and raise awareness with staff and elected members so that they:

- understand that modern slavery is an issue in the UK.
- are aware of some of the high-risk areas.
- can spot the signs of modern slavery.
- be clear about what to do and where to report it if they see something of concern.
- think about how the choices people make about what to buy may impact modern slavery.

This addendum supplements the Council's Policy and Statement by providing specific information in relation to the Company's approach, communication and governance within the Company.

Together for Children's Approach to Ensuring Compliance with the Modern Slavery Act through its Slavery and Human Trafficking Statement

The Company has a number of policies and strategies which will support us in ensuring compliance with the Modern Slavery Act. These include our Business Plan 2022-2025 with its vision:

Through Together for Children, we will improve the lives of children and their families, keep children safe from harm, and ensure they have the opportunity to fulfil their potential.

Communication and Awareness

Together for Children's zero-tolerance to modern slavery will be communicated:

a) To employees by:

- Placing this policy on the Together for Children intranet for reference

- Electronic workforce communications
 - Completion of relevant training course on safeguarding and those that incorporate modern slavery and human trafficking.
- b) To Trade Unions via the Company's regular Joint Consultative Forum meetings.
- c) To all suppliers, contractors and partners at the outset of our business relationship with them via service specifications and contract terms and conditions; and reinforced as appropriate thereafter).

Governance

The addendum forms part of this Scheme of Governance which is reviewed and approved on an annual basis by the Company's Board.