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 outlines the Company's actions to address modern slavery risks and ensure compliance with the Modern Slavery Act 2015.

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

- **Organisational structure, Business, and 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 functions. All formal procurement activities are undertaken on behalf of the Company by the Council under a Service Level Agreement.

- **Policies on Slavery and Human Trafficking.**

  The Company adheres to procurement best practice by buying a Procurement service from Sunderland City Council. This gives the Company access to the Council's diligent supply chain checks and balances to mitigate modern slavery risks. 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.

- **Due diligence processes.**

  Where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk. Due diligence is conducted through the Council's Procurement service.

- **Risk Assessment and Management.**

  The Company recognises procurement as the highest risk area for modern slavery. It has adopted the Council's updated Procurement Strategy, which includes specific references to modern slavery. Sunderland City Council Procurement staff receive mandatory training and protocols are regularly reviewed.

- **Training and capacity building.**

  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.

- **Victim Centred Response**

  In the event that modern slavery is identified, the Company will take a victim-centred approach, prioritising the safety and wellbeing of affected individuals and working with relevant authorities to ensure appropriate support and remediation.

- **Remediation and Transparency**

  The Company is committed to transparency and will report any incidents of modern slavery, including the steps taken to remediate and prevent recurrence, such as ending relationships with exploitative suppliers.

- **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 2025-2028 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.