

Modern Slavery Statement 2026 -2027

Addendum to Sunderland Council Modern Slavery Statement for Together for Children Sunderland Limited (TfC)

This statement sets out Together for Children Sunderland Limited's approach to preventing, identifying and responding to modern slavery and human trafficking within its organisation, commissioned services and supply chains.

1. Introduction

- 1.1 Together for Children Sunderland Limited (TfC) is committed to preventing modern slavery and human trafficking within its organisation, commissioned services and supply chains.
- 1.2 This statement outlines the steps taken during the reporting period 1 April 2025 to 31 March 2026 and the actions planned for 2026 - 2027 to identify, manage and reduce the risks of modern slavery and human trafficking. It has been prepared with regard to Section 54 of the Modern Slavery Act 2015 and should be read alongside Sunderland City Council's Modern Slavery Statement 2026 - 2027. TfC uses Sunderland City Council procurement services through a Service Level Agreement and aligns, where appropriate, with the Council's Modern Slavery Statement and associated governance arrangements.
- 1.3 Modern slavery is an umbrella term covering a range of offences involving the exploitation of individuals for personal or commercial gain. It includes slavery, servitude, forced or compulsory labour, human trafficking, debt bondage, domestic servitude, labour exploitation, criminal exploitation and child exploitation. Victims can be adults or children, and exploitation can occur within communities, legitimate businesses and complex supply chains.
- 1.4 TfC recognises its responsibilities as:
 - an employer
 - a provider of children's Social Care, Early Help and Education services
 - a commissioner of services
 - a safeguarding partner

- a purchaser of goods and services through Sunderland City Council's procurement arrangements

1.5 TfC takes a zero tolerance approach to modern slavery and human trafficking. We are committed to acting ethically, promoting safe reporting routes, protecting vulnerable individuals, supporting victims of exploitation and working with partners to reduce the risk of modern slavery occurring within Sunderland.

2. Organisational Structure, Business and Supply Chains

2.1 Together for Children Sunderland Limited is a private company limited by guarantee and wholly owned by Sunderland City Council. We deliver children's Social Care, Early Help and Education services across Sunderland through a combination of direct service delivery and commissioned services.

2.2 Our services support children, young people and families, including individuals who may be vulnerable to abuse, exploitation and trafficking. As both a service provider and commissioner, TfC has an important role in recognising, preventing and responding to exploitation in all its forms.

2.3 Procurement activity is undertaken through a Service Level Agreement with Sunderland City Council. Through this arrangement, TfC seeks assurance that appropriate procurement, supplier due diligence and contract management arrangements are in place to identify and mitigate modern slavery risks within its supply chains.

2.4 Our supply chain includes a range of suppliers and commissioned services, including social care placements, education provision, agency staffing arrangements and other goods and services necessary to support the delivery of children's services.

2.5 During 2025 - 2026, TfC continued to use Sunderland City Council procurement arrangements, which incorporated enhanced supplier due diligence measures following implementation of the Procurement Act 2023. These arrangements included consideration of modern slavery, labour exploitation and human trafficking risks within supplier selection, contract award and contract management processes.

3. Policies and Procedures

3.1 TfC's approach to preventing modern slavery is supported by policies and procedures designed to promote ethical conduct, safeguarding, safe recruitment, fair treatment and effective reporting mechanisms. These include:

- safeguarding policies and procedures
- recruitment and selection procedures and safer recruitment arrangements
- whistleblowing procedures
- equality, diversity and inclusion policies
- fair treatment and employee relations policies
- information governance and data protection policies
- procurement and contract management arrangements delivered through the Service Level Agreement with Sunderland City Council

- 3.2 TfC also adopts Sunderland City Council's Modern Slavery Statement and related arrangements where appropriate, whilst maintaining accountability for managing modern slavery risks arising within its own operations and commissioned activities.
- 3.3 Relevant policies and procedures will continue to be reviewed to ensure that modern slavery considerations remain proportionately and clearly reflected.

4. Safeguarding and Victim-Centred Response

- 4.1 TfC recognises that children, young people and families may be particularly vulnerable to exploitation, trafficking and modern slavery. Vulnerability may arise through abuse, neglect, poverty, criminal exploitation, unstable accommodation, coercion, isolation or a lack of trusted support networks.
- 4.2 Modern slavery is therefore considered as part of TfC's wider safeguarding responsibilities. Staff are expected to identify, report and respond to concerns in line with safeguarding procedures and established reporting pathways.
- 4.3 Our response to concerns is victim centred and safeguarding led. Individuals affected by modern slavery or trafficking should be treated with dignity, respect and sensitivity. Where concerns are identified, TfC will work with relevant agencies to ensure appropriate safeguarding action is taken, including referral to statutory agencies, the National Referral Mechanism where appropriate and specialist support services.
- 4.4 TfC recognises that fear, coercion, immigration concerns, language barriers, trauma and mistrust of authorities can prevent victims from disclosing exploitation. We will promote safe reporting routes and encourage responses that prioritise safety, support and protection.
- 4.5 During 2026 - 2027, TfC will continue to promote awareness of child trafficking, modern slavery, criminal exploitation and associated safeguarding risks. We will also reinforce awareness of National Referral Mechanism and Duty to Notify processes where appropriate.

5. Due Diligence and Procurement

- 5.1 TfC recognises that procurement, commissioning and supplier management are important areas for managing modern slavery risks. Risks may arise through complex supply chains, agency and temporary labour arrangements, subcontracting and outsourced services.
- 5.2 Procurement support is provided through Sunderland City Council under the Service Level Agreement. During 2025 - 2026, the Council reviewed procurement and supplier due diligence arrangements to align with the Procurement Act 2023, including enhanced consideration of modern slavery, labour exploitation and human trafficking risks, supplier exclusion grounds and supply chain transparency requirements. TfC relies on these arrangements for procurement activity undertaken on its behalf.
- 5.3 Through Sunderland City Council's procurement arrangements, TfC benefits from requirements promoting fair employment practices, including the Council's commitment as a Real Living Wage Employer and its expectations of relevant suppliers delivering services through applicable Council contracts.

- 5.4 During 2026 - 2027, TfC will continue working with Sunderland City Council procurement colleagues to:
- improve visibility of higher-risk supplier categories
 - consider proportionate supplier due diligence arrangements
 - review how modern slavery risks are reflected in service specifications and contract management arrangements
 - strengthen escalation routes where concerns arise through commissioned services or supplier relationships
 - establish clearer baseline reporting relating to supplier assurance and contract compliance

6. Risk Assessment and Management

- 6.1 TfC recognises that modern slavery risks may arise within its own operations, commissioned services, partnerships and supply chains.
- 6.2 Potential areas of higher risk may include:
- commissioned social care placements
 - services involving agency or temporary labour
 - facilities and support services
 - transport or community based provision
 - services involving subcontracting or complex delivery arrangements
 - any setting where children, young people, families or vulnerable adults may be at risk of exploitation
- 6.3 No confirmed incidents of modern slavery were identified within TfC's direct operations during the reporting period. However, TfC recognises that modern slavery is often under reported and that an absence of identified cases does not necessarily indicate an absence of risk.
- 6.4 During 2026 - 2027, TfC will strengthen its approach by identifying higher risk areas, improving understanding of supplier arrangements, linking modern slavery risks to safeguarding, procurement and corporate risk management, and reviewing escalation routes for concerns raised by staff, suppliers, partners or service users.

7. Training and Awareness

- 7.1 TfC recognises that workforce awareness is essential to identifying and responding appropriately to modern slavery and human trafficking. Employees working in children's Social Care, Early Help, Education, safeguarding, and commissioning may be particularly likely to encounter indicators of exploitation.
- 7.2 Mandatory safeguarding training includes content relevant to exploitation, vulnerability and safeguarding responses. Awareness is also promoted through safeguarding briefings, and partnership activity. Workforce training compliance is monitored through organisational learning and development arrangements and forms part of ongoing assurance and performance reporting.
- 7.3 During 2026 - 2027, TfC will:

- continue promoting safeguarding and modern slavery awareness
- reinforce awareness of child trafficking and criminal exploitation
- promote understanding of National Referral Mechanism and Duty to Notify processes
- encourage staff and managers to understand indicators of exploitation and trafficking
- provide targeted awareness activity where appropriate for commissioning and contract management colleagues
- use internal communications to reinforce reporting routes and available support

8. Reporting Concerns

- 8.1 TfC encourages employees, managers, contractors, suppliers, commissioned providers, partners and members of the public to report concerns relating to modern slavery and human trafficking.
- 8.2 Concerns may be raised through:
- children's safeguarding procedures
 - line management arrangements
 - whistleblowing procedures
 - commissioning and contract management processes
 - Sunderland safeguarding partnership arrangements
 - the Modern Slavery and Exploitation Helpline on 08000 121 700
 - the emergency services on 999 where there is an immediate risk of harm
- 8.3 TfC will work with Sunderland City Council, safeguarding partners, the police, relevant agencies and specialist organisations to ensure concerns are appropriately assessed and responded to.

9. Partnership Working

- 9.1 TfC recognises that modern slavery cannot be addressed by a single organisation acting alone. We work closely with Sunderland City Council and a range of safeguarding and community safety partners to identify, prevent and respond to exploitation affecting children, young people and families.
- 9.2 Relevant partners include:
- Sunderland Safeguarding Children Partnership
 - Sunderland City Council
 - Community Safety Partnership
 - Northumbria Police
 - health partners
 - education providers
 - commissioned providers
 - voluntary and community sector organisations
 - regional safeguarding, exploitation and anti-slavery networks

- 9.3 Partnership working supports the identification of victims, information sharing, awareness raising, safeguarding interventions and coordinated activity to reduce exploitation across Sunderland.

10. Governance and Accountability

- 10.1 The addendum forms part of this Scheme of Governance which is reviewed and approved on an annual basis by the Company's Board. Modern slavery is overseen by the TfC Senior Leadership Team. Compliance updates are presented to the TFC Board.
- 10.2 Operational responsibility for modern slavery sits within TfC's senior leadership and governance arrangements. Modern slavery risks are considered alongside safeguarding, procurement, commissioning, workforce and corporate risk management arrangements.
- 10.3 Oversight is provided through TfC's governance framework, with updates provided to the Senior Leadership Team and Board as appropriate. During 2026 - 2027, TfC will further clarify the internal lead, escalation routes, monitoring arrangements and the assurance provided to the Board.

11. Measuring Effectiveness

- 11.1 TfC recognises the importance of measuring the effectiveness of its approach to modern slavery. During 2026 - 2027, TfC will continue to develop reporting arrangements and baseline measures relating to:
- workforce awareness and training activity
 - the number of concerns raised or escalated
 - awareness communications delivered
 - supplier assurance activity
 - modern slavery considerations within relevant new contracts and commissioned services
 - progress against this statement and the associated action plan
- 11.2 Where reliable data is not yet available, TfC will focus on establishing proportionate reporting arrangements to support year on year improvement.

12. Priorities and Action Plan for 2026 - 2027

- 12.1 During 2026 - 2027, TfC will focus on strengthening the foundations of its approach and delivering the actions below.

13. Communication and Awareness

- 13.1 TfC's commitment to tackling modern slavery will be communicated through appropriate internal and external channels. This may include publication of this statement, workforce communications, safeguarding and learning activity, engagement with trade unions, and communication with suppliers, contractors and partners through procurement, commissioning and contract management arrangements.

13.2 TfC will continue to promote a culture in which concerns can be raised safely and are taken seriously.

14. Approval and Review

14.1 This statement will be reviewed annually to ensure it remains accurate, proportionate and reflective of TfC's developing approach to preventing modern slavery and human trafficking.

14.2 This statement was approved by the Executive of Together for Children Sunderland Limited on 29 September 2026.

Signed on behalf of the company :



Simon Marshall, Chief Executive

Date : 29 September 2026