

Introduction

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 and sets out the steps that NFCC has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Our Business

NFCC is a jointly owned Business between the Directors of Sarah Whitman and Helen Littlehales, established in 2005. NFCC provide care for hundreds of children across Hampshire and Surrey committed to ensuring each child is given the best possible experience. We are passionate about caring and preserving the magic of childhood. By developing young minds through play, we give children the comfort of a Home from Home environment to relax and socialise in before and after school. We have a wealth of experience due to our length of trading and we provide a tailored service which is able to adapt to the needs of the local children and school the environment.

Although NFCC is under no legal obligation to produce a modern slavery and human trafficking statement, we have elected to voluntarily adopt a statement to demonstrate our commitment to ensuring that modern slavery and human trafficking is not taking place within the business, with any partners or the supply chain that we work with. This is our first modern slavery and human trafficking statement and aims to show how we will act on the issue, this statement will be reviewed and updated annually.

Policy Statement

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. NFCC has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015. NFCC also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery and expects that its suppliers will in turn hold their own suppliers to the same standards.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse, and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, NFCC accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe, and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

This policy applies to all individuals working for NFCC or on NFCC's behalf in any capacity, including all colleagues, volunteers, agents, contractors, prime funders, consultants and any business partners.

Responsibility for the Policy

The Senior Management Team has overall responsibility for ensuring that this policy complies with NFCC's legal and ethical obligations.

The Senior Management Team has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. They are also responsible for investigating allegations of modern slavery in NFCC's business or supply chains.

Club Managers are responsible for ensuring that those reporting to them understand and comply with this policy.

Compliance

The prevention, detection, and reporting of modern slavery in any part of the NFCC's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for NFCC or under NFCC control. You are required to avoid any activity that might lead to a breach of this policy.

If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your line manager or report it in accordance with the NFCC whistleblowing policy. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of NFCC business or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of NFCC supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager.

You can also contact the government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.

NFCC aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. NFCC is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

Training and Communication

Regular training on this policy, and on the risk that the business faces from modern slavery in its supply chains, will be provided to staff on an ongoing basis as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

NFCC's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

NFCC may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

Breach of the Policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

Associated Documents

The following internal policies procedures support NFCC to ensure that modern slavery and human trafficking is prevented and that human rights are maintained within the company and when working with the supply chain:

- Recruitment and Selection Policy
- Safer Recruitment Policy
- Safeguarding Policy
- Whistle blowing Policy
- Equality and Diversity Policy
- Grievance Policy
- Disciplinary Policy
- Bullying and Harassment Policy and Procedure
- Health and Safety Policies