

Modern Slavery Statement

This statement is made as part of BC Healthcare's (a trading style of Bread Consulting Ltd) commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how BC Healthcare operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified and how we monitor them, and how we support our staff.

This statement is published in accordance with section 54 of the Act, and relates to the financial year July 2016 to June 2017. It was approved by the directors on 6th February 2017.

Benjamin Read

Business Development Manager / Director

1 Our Business

BC Healthcare (a trading style of Bread Consulting Ltd) is a limited company operating in the recruitment sector. We provide introduction services and supply temporary workers in the health and social care sectors.

BC Healthcare (a trading style of Bread Consulting Ltd) is an independent business.

1.1 Who we work with

All of the hirers that we work with, and all of the work-seekers we provide, are known to and identified by our staff. All of the temporary workers we supply are identified by our staff. Some of these work-seekers operate through their own limited companies.

The hiring companies that we work with are located throughout the UK. The work-seekers / workers we supply live throughout the UK.

1.2 Other relationships

As part of our business, we also work with the following organisations:

- the Nursing and Midwifery Council (www.nmc.org.uk)
- the Advisory, Conciliation and Arbitration Service (www.acas.org.uk)
- the Care Quality Commission (www.cqc.org.uk)
- the Recruitment and Employment Confederation (www.rec.uk.com) and the Institute of Recruitment Professionals (www.rec-irp.uk.com)
- Personnel Checks (www.personnelchecks.co.uk)

2 Our Policies

BC Healthcare has a modern slavery policy (available at bc-healthcare.co.uk/modern-slavery-policy)

2.1 Policy development and review

BC Healthcare's policies are established by our directors and senior leadership team, based on advice from HR professionals, industry best practice and legal advice, and in consultation with the REC. We review our policies annually, or as needed to adapt to changes.

3 Our Processes for Managing Risk

In order to assess the risk of modern slavery, we use the following processes with our suppliers:

- We conduct audits before entering into a commercial relationship with any business where there is the potential for risk. These audited businesses form the basis of our preferred supplier list.
- We review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks.

After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems, and refer to Home Office guidance and information published by the ITP to remain vigilant for areas that may affect our supply chain.

Additionally, we have taken the following steps to minimise the possibility of any problems:

- We require the businesses we work with to abide by our code of supplier conduct and address modern slavery concerns in their policies
- We collaborate with our suppliers in order to improve standards and transparency across our supply chain.
- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in any area where we have identified the potential for risk.
- We ensure that all of our suppliers are members of appropriate industry bodies and working groups.
- We work with the REC in order to combat the risk of modern slavery and human trafficking.

Our staff are encouraged to bring any concerns they have to the attention of management.

4 Our Performance

As part of monitoring the performance of BC Healthcare, we track the following general key performance indicators:

- The level of disseminated information amongst staff
- The speed with which we investigate related complaints, and the effectiveness of any whistle-blowing procedures
- The level of compliance and transparency we have established in our supply chain

Based on the potential risks we have identified, we have also established the following key performance indicators, which are regularly assessed by our directors and the senior leadership team:

- the percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements
- the effectiveness of enforcement against suppliers who breach policies
- the amount of time spent on audits, re-audits, spot checks, and related due diligence
- the level of modern slavery awareness amongst our staff

We benchmark our indicators against industry best-practice, in order to ensure that we do not put undue pressure on our suppliers that might increase the potential for risk.

5 Support for Staff

All of our staff receive support that is appropriate to their role. In particular:

- All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.

As part of this, our staff are encouraged to discuss any concerns that they have.

Information relating to this and other ethical concerns is reviewed and disseminated annually.