

This statement sets out Best Time Limited actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of a labour supply sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Best Time Limited:

Best Time Limited supplies temporary labour to clients in the areas of warehousing and distribution. It has in itself a very limited supply chain focused on the purchase of routine office equipment, furniture, hardware and computer consumables.

Countries of operation and supply

The organisation currently operates in the UK only.

High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking: Introduction of potential new labour through third parties. We are aware of the potential for new labour to be forced into work situations against their will, with the reward for providing work going to unspecified individuals rather than the worker. We are also aware of the potential of introduction fees, loans, transport and accommodation charges being levied against a forced worker.

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

Policies: Head of HR has the responsibility for putting in place and reviewing policies and the process by which they were developed.

Risk assessments: Regular meetings of senior managers, chaired by a director, have the organisational responsibility for human rights and modern slavery risk analysis.

Investigations/due diligence: General Manager Compliance, in conjunction with Head of HR has the responsibility for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking. As necessary, they have the authority to act with the authority of a director to investigate, report and ensure compliance with all aspects of the organisation's policies and procedures. Where necessary they have the authority to second other staff to assist in any way they deem fit.

Training: Every permanent employee with any responsibility for taking on and directing labour is given suitable training within their first week of work. Our training usually will follow closely and specifically that suggested and specified under the Stronger Together banner.

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Policy on preventing hidden labour exploitation: The organisation commits to developing and adopting a proactive approach to tackling hidden labour exploitation. Hidden labour exploitation is exploitation of job applicants or workers by third party individuals or gangs other than the employer or labour provider including rogue individuals working within these businesses but without the knowledge of management. It includes forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation.

Whistleblowing policy: The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can also make use of our anonymised and confidential helpline.

Employee code of conduct: The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour and managing its supply chain.

Recruitment/Agency workers policy: The organisation uses only specified, reputable agencies that have signed up to Best Time policies to source labour and will always verify the practices of any new agency. This includes a signed agreement that any third party supplier will not make any charge to a worker for an introduction.

Other policies relevant to the organisation's business: We have other relevant policies, for example a corporate social responsibility policy and anti-bribery policy to help assure ourselves of our responsibilities.

Due diligence

The organisation undertakes to perform due diligence when considering taking on new suppliers, and will regularly review all suppliers. This will include:

Evaluating the modern slavery and human trafficking risks of each new supplier.

Conducting supplier audits or assessments through the organisation's own staff which have a greater degree of focus on slavery and human trafficking where general risks are identified.

Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular, such as participation in "Stronger together" or "Ethical trading" initiatives.

Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship. This will include receiving illegal instructions from clients reference the supply of labour with/without protected characteristics.

Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is requiring all permanent staff working in areas that include the control and direction of labour to have completed training on modern slavery by the end of first week of employment.

Training:

The organisation requires all staff working in areas that include the control and direction of labour within the organisation to complete training on modern slavery as part of an induction process within the first week of employment. This includes a wider human rights/ethics/ethical trade programme.

The organisation's modern slavery training covers:

How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;

How to identify the signs of slavery and human trafficking;

What initial steps should be taken if slavery or human trafficking is suspected;

How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;

What external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;

What messages, business incentives or guidance can be given to other business partners and contractors to implement anti-slavery policies.

Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by putting up posters across the organisation's premises, circulating a series of emails to staff, making use of a Worker Portal and randomised emails involving a questionnaire.

The posters/emails explain to staff:

The basic principles of the Modern Slavery Act 2015;

How employers can identify and prevent slavery and human trafficking;

What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and

What external help is available, for example through the Modern Slavery Helpline.

Board approval

This statement has been approved by the organisation's board of directors/members, who will review and update it annually.