

Modern Day Slavery Statement



Our Commitment

As a leading childcare provider, we insist on upholding the highest standards and ethics at every level of our business. We are committed to acting with integrity, honesty, transparency and fairness at all times, to uphold our ethical standards and to protect our reputation.

The Busy Bees vision is to give every child the best start in life, underpinned by our values of "Care, Quality, Service and Value". Our commitment to these values is codified in our Code of Conduct, which we issue to our workforce to make clear that we are expected to operate to the highest standards in everything we do.

We recognise that modern slavery is a growing global issue and we understand that we are responsible for preventing, mitigating and addressing (if necessary), these risks in our business and our supply chain. We will always treat people in our business and supply chain fairly and will not tolerate slavery, servitude, bonded, forced or compulsory labour in the manufacture of products we use and will not accept products or services from suppliers who employ or utilise slavery, servitude, bonded, forced or compulsory labour in any manner.



Simon Irons
Group CEO



Our organisation

Since inception in 1983, Busy Bees has become synonymous with high quality care and education. Busy Bees is proud of its practical, child-centred approach, where children are respected as individuals and encouraged to learn and develop at their own pace within a home from home environment that meets rigorous safety standards, including more recently robust Covid-19 protocols.

From its Staffordshire roots Busy Bees has grown to become the largest provider of childcare in the UK. Our international footprint now takes our exceptional education into eleven countries, crossing four continents.

Our values: Care, Quality, Service and Value underpin everything that we do across our centres and our National Support Centres. Attracting the highest quality educators for our centres and the highest calibre of department expertise is key in delivering exceptional education and care. With sector leading, long standing leadership teams Busy Bees remains dedicated to its vision to give every child the best start in life and stands by these quality standards in the UK and internationally.

Our people

The Busy Bees workforce in the United Kingdom is made up of contracted staff, consultants and agency workers. We have effective systems and controls in place to address the risk of slavery taking place in our business, in particular:

- Robust safer recruitment and employment policies and procedures for all our staff, consultants and workers.
- We check the names and addresses, references, legal right to work and criminal record of our staff and consultants, with a new system in place to record these checks. Agencies are required to provide evidence of safer recruitment checks of any workers provided.
- We only use reputable recruitment and staffing agencies, and conduct diligence on these agencies before adding them to our approved list of agencies, including:
 - o Background checks.
 - o Checking agency staff have required paperwork.
 - o Ensuring agencies are contractually committed to carry out checks on the staff they provide.
- Our safer recruitment checks and standards have not been affected by the Covid-19 pandemic.
- We provide our staff with a confidential and anonymous Speak Up helpline where they can raise any concerns in respect of slavery in our business or

our supply chains. Our helpline is supported by our Speak Up policy, which was refreshed during 2020, with all our staff trained annually on the requirement to Speak Up to help Busy Bees address any suspected misconduct.

- Our confidential Employee Assistance Programme also provides our staff with a secure way of seeking advice about any modern slavery or human trafficking issues personally affecting them or their families.

Our supply chain

Our primary group of suppliers at Busy Bees are those that supply our centres, including food, nursery equipment, consumables, cleaning and maintenance services. We have implemented systems and controls to address the risk of slavery taking place in our supply chain, in particular we:

- Carry out due diligence on all our key suppliers (extending this in 2020 to our entire maintenance contractor base) prior to onboarding.
- Conduct annual reviews of our key suppliers' policies and procedures to ensure slavery is not taking place in their business.
- Expect all those in our supply chain to comply with our values, with key suppliers required to commit to modern slavery contractual obligations. We will not support or deal with any business knowingly involved in modern slavery or human trafficking.

Our policies

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery Global Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. This policy sits alongside a framework of Busy Bees policies, which ensure our values are reflected in all our activities, including:

- Speak Up – ensures all staff have a confidential avenue to report concerns through, with both the policy and the related training refreshed for the annual roll out during 2020.
- Code of Conduct – sets out our values and expectations of our people.
- Safer Recruitment – which sets out the checks that must be completed ahead of any individual being recruited by Busy Bees.
- DBS (England & Wales) and PVG & SSSC (Scotland) – outlines our approach to these safeguarding checks and services at Busy Bees.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide annual training to our staff, which was updated during 2020.

Covid-19 Pandemic

As advised by the Home Office Guidance published in April 2020 (and as set out in our Modern Slavery Statement 2020), we focused, due to the impact of the Covid-19 pandemic, on the health and safety of our workforce and considered how changes might lead to new or increased risk of labour exploitation.

The risks created by the Covid-19 pandemic required (and continues to require) us to review and adapt our health and safety and welfare practices and policies in our centres and places of work. Busy Bees has prioritised the protection and well-being of our children, families and our staff during the pandemic, implementing or enhancing procedures and policies as necessary. We have a robust management system in place for Covid-19, with our processes and documentation commended by numerous public health professionals as being excellent. We retain a central record of Covid-19 information and have specific risk assessments, guidance and procedures to ensure our staff have clear information on the controls needed. We have also put together letters, leaflets, videos and press statements to keep our staff and families up to date on how we manage the risk.

We have an internal team that oversees guidance and information shared to our staff to ensure it is in line with Government, Public Health and Educational advice and legal requirements. This approach has enabled us to provide a safe environment despite the risk, reduced staffing and lockdown considerations. We have a clear process for reporting people who are symptomatic or have a positive Covid-19 case and undertake tracking of each positive case in our business that mirrors public health protocols and guidelines.

We took proactive steps to ensure our higher risk staff (including those required to self-isolate during the pandemic) were appropriately protected and supported during this period. In addition, the accessibility of our Speak Up helpline, our Employee Assistance Programme and our grievance procedures have been unaffected by the pandemic, to support our staff generally and enable them to raise concerns about modern slavery affecting them or their families.

We have also proactively engaged with our key suppliers throughout the Covid-19 pandemic to ensure we manage orders and payments efficiently, helping to support their cashflow during this period.

Further steps

We will continue to periodically review the effectiveness of the steps we have taken to address the risk of slavery or human trafficking in our business and supply chains. Our focus, during 2021 will be on:

- Continuing to consider and respond to the increased risks resulting from the Covid-19 pandemic.
- Extending our systems and controls more widely across our supply chain (beyond key suppliers), widening our mitigation of supply chain risk through the issue of a business wide Procurement Handbook, policy and guidance.
- Introducing modern slavery risk indicators in our supply chain due diligence and quarterly supplier audits for modern slavery risk compliance.
- Working with our external legal counsel to complete our 2020/2021 modern slavery audit. This audit will help us to further assess the effectiveness of our systems and controls and provide insight on ways we can continue to improve and mitigate the risk of slavery and human trafficking in our business or supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It sets out the steps Busy Bees Holdings Limited and Busy Bees Nurseries Limited (and their respective subsidiaries) ("Busy Bees") have taken (during the financial year ended 31 December 2020), and will continue to take, to address the risk of modern slavery and human trafficking occurring in the Busy Bees business and its supply chains. The statement was approved by the board of both Busy Bees Holdings Limited and Busy Bees Nurseries Limited on 28 June 2021.