

# 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.



**Rob Hughes**  
CEO, Australia



## Our organisation

Since inception in the UK in 1983, Busy Bees has become synonymous with high quality care and education. With its acquisition of Australian based, Foundation Early Learning in 2018, Busy Bees has brought to Australia 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.

Building on the existing local Australian roots overlaid with best practices from across the global Busy Bees network that extends to eleven countries, crossing four continents, Busy Bees Australia has grown to become one of the largest providers of early years education and childcare in Australia.

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 Australia and internationally.

## Our people

The Busy Bees Australia workforce is made up of permanent part-time and full-time employees supplemented, as needed, by 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:
  - Background checks.
  - Checking agency staff have required paperwork.
  - Ensuring agencies are contractually committed to carry out checks on the staff they provide.
- Our 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 Program 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, centre 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 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 chain 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 employees have a confidential avenue to report concerns through, with both the policy and related training refreshed for the annual roll out during 2020.
- Code of Conduct - sets out our values and expectations of our people.
- Manage Recruitment and Onboarding- sets out the checks that must be completed ahead of any individual being recruited by Busy Bees Australia which align with requirements under the Australian Education and Care Services National Regulations and the Australian Government's National Principles for Child Safe Organisations.

## 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.

## 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:

- Assessing risk in our supply chain, reviewing and improving our existing systems and controls and providing focused training for all those who carry out procurement in our business on the risks of modern slavery and human trafficking.
- 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 on behalf of the reporting entities Busy Bees Australia Holding Pty Ltd, Busy Bees Australia Bidco Pty Ltd and Busy Bees Early Learning Australia Pty Ltd ("Busy Bees Australia"). This is Busy Bees Australia's first modern slavery statement, which has been prepared in accordance with the requirements of the Modern Slavery Act 2018 for the financial year ending 31 December 2020. Busy Bees Australia is part of an international group with headquarters in the UK ("Busy Bees"). Busy Bees Australia, and the entities they own and control are managed centrally by the Busy Bees Australia management team, with shared governance, policies and procedures in respect of modern slavery risk, which also reflect Busy Bees group governance standards. Due to this structure, a consultation process in respect of the reporting entities, and the entities owned or controlled by the reporting entities was not required. The statement sets out the steps Busy Bees Australia 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 Australia business and its supply chains. The statement was approved by the board of Busy Bees Australia Holding Pty Ltd (the Australian parent company for Busy Bees Australia) on 29 June 2021.