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Modern Slavery & Human Trafficking

Version number	2.1	Type of Document	Policy
Audience	Millbrook Healthcare Group Employees		
Approved by	-	Date Approved	-
Policy Author	HR Director		
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Forms / Further Information			

1. Introduction

Millbrook Healthcare is a national service provider to the NHS and Local Authorities for community equipment services, home improvement agency services and assistive technology.

The Millbrook Healthcare Board recognises we have an extensive supply chain and we continually procure goods and services. We work with a wide range of different suppliers, subcontractors and partners each of which has their own subcontractors and associated entities. Millbrook Healthcare Group and its associated companies is connected to multiple entities through numerous contractual, supplier and buying and supply chain relationships across many countries.

In the light of the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, we continually reviewed our existing compliance and risk management processes to determine to what extent measures already exist, and what further measures may be required to prevent modern slavery and human trafficking taking place in any part of our businesses or in our supply chains. The policy below underpins our approach, and will be used to inform our Statement on Modern Slavery and Human Trafficking to be published annually. The Board is committed to anti- modern slavery and is committed to this policy.

2. Definition

Modern slavery is a crime and a violation of fundamental human rights. The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- child labour
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

3. Our approach

Millbrook Healthcare Group has adopted a statement of our corporate value on the prevention of modern slavery and human trafficking. The value statement governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

We expect all or who have, or seek to have, a business relationship with Millbrook Healthcare and/or any associated companies within Millbrook Group, to familiarise themselves with our anti-slavery value and to act at all times in a way which is consistent with our anti-slavery value.

4. Anti-Slavery Value Statement

As part of our culture of good governance for good business, in Millbrook Healthcare we have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

5. Application of this policy

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment and we may amend it at any time

6. Responsibility for the Policy

Ultimate responsibility for the prevention and prevention of modern slavery rests with the Company's leadership. The board of directors of the Company has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

Managers, Supervisors and Team leaders at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

The Head of Governance has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Head of Governance.

7. Compliance with this Policy

You must ensure that you read, understand and comply with this policy.

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

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Those who are accessing this policy outside of the company who wish to because they are seeking a business relationship with us/our businesses or already have a business relationship with us/our businesses are also advised to familiarise themselves with the main features of our measures for combating modern slavery

8. Company Employees - actions to report

You must notify your manager or the compliance as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or Director.

We aim 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. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform the Head of Governance immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

If in doubt or if the matter is extremely serious employees should approach their Director or the Human Resources Director. The nature of the complaint will determine the Company's next course of action.

9. External third parties - actions to report

Those who are accessing this policy outside of the company who need to report or raise concerns should contact the Company's Managing Director or Head of Governance.

You should call this line in any of the following circumstances:-

- You suspect a person acting on behalf of Millbrook Healthcare Group or one of our businesses is seeking to exploit another in a way which could amount to modern slavery;
- You suspect that a person acting on behalf of one of our suppliers is seeking to exploit another in a way which could amount to modern slavery;
- You have received an approach from a person acting on behalf of Millbrook Healthcare or one of our businesses who has invited you to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed;
- You have information which leads to the rational conclusion that a person acting on behalf of Millbrook Healthcare or one of our businesses or suppliers is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

Reports to the Suspicious Activity Confidential Feedback line are kept in confidence, subject to the need for Millbrook Healthcare to act responsibly and within the law. The source of reports to the Line will be kept confidential, save to the extent that our maintaining that secrecy or the anonymity of the source is not permitted by law, or is not consistent with our maintaining our adequate procedures for the prevention of

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modern slavery being committed on our behalf or in any element of our supply chain.

The Company also encourages members of the public or people not employed by us to write, in confidence to the Head of Governance at Millbrook Healthcare Group, Nutsey Lane, Calmore Industrial Estate, Totton, Southampton SO40 3XJ to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

10. Safeguards

We aim 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. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously.

However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

11. Communication and Awareness of this Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

12. Migrant Worker

The company will only employ workers who are legally entitled to work in the United Kingdom. All employees will be required to undertake an appropriate right to work check, regardless of their nationality, by reviewing appropriate immigration documents or by accessing an online right to work check.

13. Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

14. Review

Following its initial adoption, this Modern Slavery and Human Trafficking Policy will be reviewed by the Company's Board of Directors on a regular basis (at least annually) and may be amended from time to time. This Policy will be used to inform our Statement on Modern Slavery and Human Trafficking which will be published in our financial results.

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