

**Modern Slavery and Human Trafficking Statement 2019**  
**Hallmark Care Homes Group Holdings Limited and subsidiary companies ('Hallmark Care Homes')**

Hallmark Care Homes is a family-run provider of multi-award-winning care homes. We have 18 care homes across England and South Wales and are recognised in the industry for providing high quality care and innovative facilities. We pride ourselves on our vision 'to be recognised as the leading provider of high quality, relationship-centred care for all residents'. [The Hallmark Care Homes Charter](#) enshrines our key values and establishes our organisational culture.

The Modern Slavery Act 2015 requires commercial organisations operating in the UK, with an annual turnover in excess of £36 million, to produce a slavery and human trafficking statement for each financial year of the organisation. This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 March 2019. It demonstrates the steps Hallmark Care Homes has taken, and will continue to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery is an international crime affecting over 40 million people around the world. It includes victims trafficked from overseas and vulnerable people in the UK, who are forced to work against their will. Hallmark Care Homes has zero tolerance to slavery and human trafficking in all its business dealings. We are also committed to the prevention of slavery and human trafficking, in all its forms. We will not tolerate or condone it within any part of our business or supply chain.

### **Structure and supply chains**

We have surveyed all suppliers and have produced a report on their organisational structure and supply chains including:

- the main services provided and the procurers of these services;
- the company structure;
- the structure of supply chains;
- the location countries of supply chain;
- whether suppliers are engaged seasonally and the percentage of employees on temporary/seasonal contracts;

We have reviewed the information received by suppliers, and there are no concerns. Neither are there any suppliers which we deem to be high risk with regards to slavery or human trafficking. We will conduct this survey each year, reviewing information returns and acting on any concerns we have.

Through our reviewed procurement policy, we have introduced measures to ensure adequate procurement pricing and prompt payment is in place.

## **Policies and procedures**

As part of a pre-defined review of all relevant HR/personnel policies, appropriate guidance on modern slavery has been developed and introduced. These reviewed policies state our expectations of the team and how they should handle concerns they have around modern slavery. They also reassert our zero-tolerance approach to modern slavery practices.

We have also reviewed our Procurement policy and have ensured that an assessment of modern slavery practices is conducted, both prior to contracting with a new supplier, and as part of any tender process. We have introduced a standard modern slavery term which will be included in all new service level agreements with suppliers, moving forward.

## **Due diligence**

We have surveyed suppliers who exceed the turnover threshold on their modern slavery practices. Following this, we have been able to assess:

- The current processes to ensure that human trafficking and slavery do not exist in supplier's operations and supply chain.
- Whether suppliers work with a third party to identify the overall risks of slavery and human trafficking in their supply chain.
- Whether suppliers conduct independent, unannounced audits of their operations and suppliers.
- Whether suppliers require their direct suppliers to certify that all materials incorporated into their final product were sourced, processed and manufactured in compliance with the human trafficking and slavery laws of the country, or countries, in which they operate.
- The company's standards on human trafficking and slavery.
- Whether management employees, particularly those in charge of supply chain management, have been trained to understand what slavery and human trafficking are and how to mitigate the risk of them in their respective supply chains.

We have also received and reviewed these companies Slavery and Human Trafficking statements. This information will be reviewed each year and any queries will be raised with the supplier directly.

## **Risk assessment and management**

The risk linked to modern slavery have been assessed and are managed via the Group's quarterly Risk Management committee. The risks, along with existing and required mitigating controls, are stated on the Group's organisational risk register. These are reviewed ahead of each meeting and modern slavery, as a topic, is a specific agenda item on a bi-annual basis.

## **Effective action taken to address modern slavery**

There have been no disclosures or any identified instances of modern slavery within the company, or supply chain, to date. We have whistleblowing procedures in place which allow our team to raise concerns of any nature internally to our Managing Director, or externally via a dedicated neutral phone service.

Owing to both the existing systems we had in place, and the progress made as highlighted in this statement, we are confident that should disclosures be made, we have appropriate systems and processes in place to ensure corrective action is taken promptly.

### **Training**

We have conducted face to face training for senior leaders in the organisation which will be refreshed every 3 years. We have provided an information factsheet to all other team members. This is on prominent display in the team area in each of our care homes and will be checked during bi-annual quality assurance audits. Over the coming financial year, we plan on developing further training for the team to embed knowledge and understanding in this area.

**This statement has been formally approved by both, the Executive Leadership Team and the Shareholders of Hallmark Care Homes Group Holdings Limited (and subsidiaries) and signed on their behalf.**



**Ram Goyal**  
Managing Director  
27 March 2019