

Modern Slavery and Human Trafficking Statement 2020 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 20 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 at the end of each financial year. 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 2020. 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.

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 re-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 we have 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.

Our Procurement policy, introduced last year, continues to ensure that adequate procurement pricing and prompt payment is in place.

Policies and procedures

Our Bullying & Harassment and Recruitment policies include specific reference to modern slavery. These policies state our expectations of the team and how they should handle concerns regarding modern slavery. They also reassert our zero-tolerance approach to modern slavery practices.

Due diligence

We have re-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.

Risk assessment and management

The risk linked to modern slavery have continued to be assessed and 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 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 phone service.

From April 2020, we will also conduct payroll checks biannually to ensure that no team member is having their salary paid to someone else, against their wishes.

Owing to the existing systems we have 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 provided an information factsheet to all team members previously, which also included a link to the Home Office guidance. Moving forward, we will send out quarterly reminders about this. This is on prominent display in the team area in each of our care homes and will be checked during annual quality assurance audits. Modern slavery is also addressed in our company induction.

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
19 March 2020