

## Slavery and Human Trafficking Statement 2022

### 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 19 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 2022. 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.

#### Due diligence of supply chains

In February 2022, we invited suppliers to complete a survey and produced a report on the responses received which includes:

- The current processes to ensure that human trafficking and slavery do not exist in the 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 reviewed the information received by suppliers and we have no concerns. We will conduct this survey each year, reviewing information returns and acting on any concerns we have.

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

### **Policies and procedures**

Our Grievance policy details how formal concerns can be raised and how they will be investigated and responded to.

Version 3 of our Whistleblowing policy was released in February 2022 and details the different whistleblowing pathways open to team members, should they have any concerns. Team members can raise concerns of any nature internally to our Chair, or to an independent Whistleblowing Lead.

### **Risk assessment and management**

The risks linked to modern slavery have continued to be assessed and managed on a biannual basis, via the Group's Risk Management Committee. The risks, along with existing and required control measures, are included on the Group's organisational risk register. These are reviewed ahead of each meeting and modern slavery, as a topic, was discussed by the Committee in April and October 2021.

### **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 also conduct payroll checks, annually, to ensure that no team member is having their salary paid to someone else, against their wishes. There were no concerns with outcome of the checks completed in March 2022.

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, alongside the Home Office's 'Modern Slavery awareness and victim identification guidance' booklet. This is on prominent display in the team area in each of our care homes and is checked during annual compliance audits. A copy is also available via our internal intranet.

We have now developed a bespoke modern slavery e-learning module. This training will be launched in the first quarter of the 2022/2023 financial year and is aimed at line managers in the organisation. This training covers:

- The forms modern slavery can take.
- The relevant legislation.
- The signs line managers should look out for.
- How concerns can be reported.
- Our organisational response to modern slavery.

**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.**



**Aneurin Brown**  
Managing Director  
20 April 2022