

## **Modern Slavery statement for the financial year 1 January to 31 December 2019**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out BHSF Group Limited's approach to understand all potential modern slavery risks related to its business, and to put in place steps aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities implemented during the financial year 1 January 2019 to 31 December 2019.

Modern slavery encompasses slavery, human trafficking and forced labour. BHSF Group Limited recognises that it has a responsibility to take a robust approach to slavery and human trafficking and is absolutely committed to preventing slavery, human trafficking and forced labour in its corporate activities.

### **Organisational structure and supply chain**

BHSF Group Limited and its subsidiary companies (BHSF Limited, BHSF Management Services Limited, BHSF Employee Benefits Limited, BHSF Corporate Healthcare (Holdings) Limited, BHSF Occupational Health Limited, BHSF Medical Practice Limited and Nexus Healthcare Limited) provides medical expense insurances, other insurances, a range of employee benefits services and occupational health services to 4,000 client businesses and 313,000 policyholders and their families.

#### *Countries of operation and supply*

BHSF currently operates in the UK and the Republic of Ireland and all products and services are sourced within these geographical areas.

The majority of the Group's supply chain is regulated/governed by professional bodies and is part of a sector and geographical location where slavery and human trafficking is considered low risk.

#### *High-risk activities*

There are no activities within the business operations taking place that are considered to be at high risk of slavery or human trafficking.

#### *Responsibility*

Responsibility for the Group's anti-slavery initiatives is as follows:

- **Policies:** Those policies listed in Policies and controls below have been approved and adopted by the Group and are reviewed on an annual basis.
- **Training:** The Chief Transformation Officer reviews external briefings on the impact and requirements of the Modern Slavery Act, with relevant information cascaded down to the HR and Learning & Development teams. Enhancements to the recruitment policy and recruitment processes throughout the Group are made on a continuous improvement basis as a result.

In-house training for all colleagues with responsibility for recruitment interviewing continues to be undertaken via an e-learning course incorporating the principles and requirements of the Modern Slavery Act.

### **Policies and controls**

BHSF operates the following internal policies that ensures it conducts business in an ethical and transparent manner.

- **Whistleblowing policy** – the policy is in place to allow all employees to be able to report any concerns about how their colleagues are treated or to report any concern regarding our business practices. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. This whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.

- **Employee code of conduct** – our code of conduct makes it clear to all of our employees the actions and behaviours expected of them when representing the Group. BHSF strives to maintain the highest standards of employee conduct and ethical behaviour in all of its operations.
- **Recruitment policy** – BHSF uses specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting candidates from that agency. The recruitment policy is comprehensive and ensures that each new employee has the right to remain and work in the UK, an important and most relevant measure to address the risk of slavery and human trafficking within the Group.

We have continued to use the Vero vetting and screening service that was introduced during 2018. This further enhances our rigorous identity checking processes in addition to our right to work checks which are made for each new starter in every area of our business.

We have also introduced the Citation HR advice that provides information, advice and guidance on a range of Human Resources matters including those relating to Modern Slavery so that we can ensure our own policies and practices are reflective of this best practice.

## **Due diligence and risk assessment**

BHSF's own business is the provision of medical expense insurances, other insurances, a range of employee benefits services and occupational health services which is regarded as a low risk sector. All employees are engaged on written terms which comply with UK law, have a right to terminate their contract of employment and are paid at least the National Minimum Wage as well as receiving other fixed and flexible benefits. BHSF is also subject to a high degree of sector-specific regulatory and other independent oversight. BHSF is satisfied that the risk of slavery or human trafficking occurring in its own business is low. In addition, a revised Outsourcing and Supplier management policy was implemented in 2019 which mandates due diligence on ethical standards prior to provisional appointment of suppliers.

## **Assessment of effectiveness**

During the financial year to December 2019 there have been no reports of any slavery and/or human trafficking taking place within our business. This has been certified by:

- All new employees engaged throughout the year have been confirmed through our rigorous recruitment processes as having the right to remain and work in the UK;
- All employees within the Group meeting the requirements of the National Minimum Wage;
- There having been no reports received from employees, the public or any law enforcement agency to indicate that any form of modern slavery practices have been identified.

## **Future Steps**

Throughout the 2020 financial year BHSF is continuing to assess the risk of slavery and human trafficking in its own businesses and will extend its risk assessment processes further into its supply chain.

## **Board approval**

This statement has been approved by the board of directors of BHSF Group Limited who will review and update it annually.

## **Director's signature:**



**Ian Galer, Group Chief Executive**

**Date: 17 June 2020**