

Robert Heath Group Policies & Procedures



## Modern Slavery Policy and Procedure

<b>Authorised by:</b>	<b>Board of Directors</b>
<b>Date:</b>	<b>April 2023</b>
<b>For Use By:</b>	<b>All Staff</b>
<b>Status:</b>	<b>Approved</b>
<b>Policy Author:</b>	<b>Mikki Williams - HR</b>
<b>Policy Ref Number:</b>	<b>WBPP1219</b>
<b>Date of last review:</b>	<b>March 2023</b>
<b>Date of Next Review:</b>	<b>March 2024</b>

## **Introduction**

Although Robert Heath Group Limited and component companies are not deemed a relevant commercial organisation as defined by section 54 (Transparency in supply chains etc) of the Modern Slavery Act This statement has been produced in accordance with the Modern Slavery Act 2015, we recognise obligations in this area and have therefore produced the following document which sets out the actions that Robert Heath Group Limited will take to understand potential modern slavery risks related to its business activities and supply chains. This statement relates to actions and activities during the current financial year.

Robert Heath Group Limited is committed to preventing modern slavery in its business activities and its supply chains and detailed below are actions that have been implemented, and will continue to be, with the aim of fulfilling this commitment.

## **Policies**

We are committed to the prevention of modern slavery which includes servitude, forced labour, human trafficking and child slavery.

Our Modern Slavery policy is delivered through a range of associated policies and procedures:

- Ethical Code of Conduct Policy
- Recruitment Policy
- Environmental Policy
- Corporate Responsibility Policy
- Work Safe & Whistleblowing Policy

Ultimate responsibility for ensuring prevention of modern slavery and for monitoring compliance to this modern slavery policy is held by Michael Heath, Managing Director.

The responsibility for monitoring of compliance including employee salary, employment rights and supply chain compliance is that of Stuart Cocks, Commercial Director.

## **Understanding the Risks of Modern Slavery**

The key direct risks of Modern Slavery to Robert Heath Group are:

- No contracts of employment including zero hours contracts.
- Under pay of employees, self-employed contractors and subcontract companies – not paying as a minimum the living wage, and not paying an appropriate market rate for services engaged.
- Excessive working hours – the majority of our direct employees have signed Working Time Opt Out Agreements. It is noted that this can lead in some organisations to excessive working hours, defined as, in line with NHS policy as greater than 56 hours per week, or not providing suitable rest periods between shifts or as a minimum a day off per fortnight.
- Not been entitled to work in the country of employment.
- Poor physical working conditions, including safety conditions.
- Bullying, discrimination and harassment.

## **Due Diligence**

We shall ensure that:

- Individuals have the right to work in the country of employment.
- as a minimum a Living Wage is paid.
- that pay reflects current market values for the sector and role.

- that working hours restrictions are complied with, and excessive working hours discouraged.
- that bullying, discrimination and harassment is not permitted or tolerated in any form.
- that site conditions are safe and provide a working environment conducive to the protection of the environment, human health and quality workmanship.

Regarding our supply chain our company is a medium company and thus our ability to influence the supply chain is limited. We do not sub-contract work. We will however implement due diligence in our supply chain in relation to modern slavery:

We issue supplier questionnaires to all our key suppliers to enable us to undertake compliance checks to our requirements and to legal requirements regards modern slavery.

Our contractual requirements require adherence to the Modern Slavery Act 2015.

We expect our customers to deliver the same ethical treatment of us as a supplier, particularly in regards to payment terms and conditions, rates of pay and timely payment of applications.

### **Staff Training**

We will provide all management staff training in relation to modern slavery.

### **Assessing Effectiveness**

The delivery of this modern slavery policy shall be monitored and shall form part of annual management performance review.

### **Corrective Actions**

Should an occurrence or potential occurrence of modern slavery be identified, either internally related to employment practice or working conditions, or externally within the supply chain then appropriate corrective action shall be taken in line with the company's Control of Non-Conformity Procedure. All non-conformity shall be recorded and the required actions implemented in a timely manner.

### **Policy Review**

This will be subject to review following any lessons learnt, identification of non-compliance and as a minimum annually.

### **Policy Approval**

As the individual ultimately responsible for company compliance I endorse this policy. Signed on behalf of Robert Heath Group Limited



**Michael Heath – Managing Director**

1<sup>st</sup> April 2023

Review date: 31 March 2024