

# Our response to the Modern Slavery Act

## Modern Slavery Act Statement 2020

### Introduction

This statement applies to all companies within and associated to Totally plc as the parent company (referred to in this statement as the Group). This statement relates to actions and activities during the financial year ending 31st March 2021.

The Group is committed to improving its practices to combat modern slavery and human trafficking. This statement sets out the Group's actions to understand all potential modern slavery risks related to its business and to ensure that there is no slavery or human trafficking in its businesses or supply chains.

The Group will strive to improve its practices and to ensure that those we work with, including our partners, do so as well. The Group, as a national organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

### Governance

This statement, relating to the financial year ending 31 March 2021, is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the 'Act') and outlines the steps we have taken as an organisation to assess our operations and supply chain and mitigate any risk of slavery and human trafficking. The Group is committed to conducting business ethically and responsibly and fully support the aims of the Act and associated standards such as the UN Guiding Principles on Business and Human Rights. We are committed to tackling slavery and human trafficking wherever we can. The executive team and the Board will review and oversee implementation of the modern slavery statement. It sets the Group approach for modern slavery compliance by our colleagues across the business and, where relevant, in the Group functions. The executive team manages the composition and publication of our annual statement and provide updates to management as well as the Board.

### Organisational Structure and Supply Chains

The Group is engaged in addressing the challenges of the UK and Ireland healthcare sector by delivering out-of-hospital care and providing a range of innovative services to the UK and Ireland healthcare sector.

The Group consists of multiple trading subsidiaries:

- Premier Physical Healthcare Limited
- About Health Limited
- Totally Healthcare Limited
- Optimum Sports Performance Centre Limited

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- My Clinical Coach Limited
- Vocare Limited, and
- Greenbrook Healthcare Limited

All subsidiaries have internal hierarchy structures, which are controlled by Totally plc. The Board of Directors of Totally plc are responsible in ensuring the hierarchy of its subsidiaries meet good corporate governance standards around Clinical Quality, Finance, HR and OD, Corporate, Social and Environmental areas.

The Group operate services at multiple operating sites across all regions within the UK and Ireland. The Group through its subsidiaries provides services by driving innovation and providing a range of responsive and preventative healthcare services in community settings, urgent care centres, GP surgeries, prisons, workplaces and patients' homes, from pre-diagnosis to discharge. These out of hospital services include NHS 111, GP out of hours care, physiotherapy, podiatry, dermatology, referral management services and clinical health coaching. The Group operates numerous contracts with the NHS as well as other public and private sector organisations across the UK and Ireland.

## Relevant Policies and Procedures

We are committed to ensuring there is no modern slavery or trafficking in our business or supply chains and we require all our suppliers to comply with relevant policies; including our Equal Opportunities Policies and specifically to pay due regard to the health, safety, welfare, and dignity of those with whom they come into contact. This will be supported by our supplier code of conduct.

## Due Diligence and risk assessment

The level of due diligence undertaken depends on the location and the nature of the work. A comprehensive checklist of policies enables the Group to identify risks of modern slavery and trafficking in the business and its supply chain. If a risk is identified a more detailed due diligence exercise is undertaken, so that appropriate and informed decisions about the proposed work can be made. Modern slavery risks will be considered in the Group's organisational risk register which is reported accordingly in our annual report.

The Group does not enter into business with any other organisation in the UK and Ireland which knowingly supports or is found to involve slavery, servitude and forced or compulsory labour.

## Monitoring our Performance

The Group has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Group or its supply chains.

The Group will:

- Monitor the number of new staff who receive training in relation to the requirements of the Act through our own internal training and induction programmes;
- Monitor the instances of current suppliers found to be in breach of the requirements relating to the Act;

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- Be responsible for compliance and that these measures have been successfully implemented and reviewed on an annual basis.

*The Group has developed a system for supply chain verification which enables the Group to evaluate potential suppliers before they enter the supply chain and the organisation will continue to monitor this. The Group has also appointed a Procurement Manager to oversee and improve the procurement practices of the organisation.*

## Training

It is essential that all our staff have an awareness of modern slavery issues. We will provide, on an ongoing basis, information and training to staff. We will also provide one to one support and guidance to our staff:

- How to identify the signs of slavery and human trafficking;
- What steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high risk scenarios, including their removal from the organisation's supply chains;
- What initial steps should be taken if slavery or human trafficking is suspected;
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation.

What external help is available, for example through the [Modern Slavery Helpline](#)

## Our response to addressing modern slavery risks during the COVID-19 pandemic

We understand that some workers may be more vulnerable to modern slavery during the coronavirus pandemic. Some of the issues we have considered include:

### The health and safety of workers

It is important that the relevant local or national government policies are implemented throughout our supply chain. This includes adopting social distancing measures and paying statutory sick pay in order to prevent the spread of coronavirus.

### Supporting suppliers

As a responsible business we have prioritised engagement with our suppliers, including paying for orders already in production where possible. Whilst some previously placed orders may no longer be required, we have made sure late cancellations are kept to a minimum to avoid workers not receiving wages for work they have completed.

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### Grievance procedures

It is important that our workers are still able to access grievance procedures and that new or adapted procedures are made available to all our staff where necessary.

### Recruitment

We know some suppliers may be seeking to recruit additional workers in order to meet increases in demand. We and our suppliers ensure that we maintain rigorous checks during the recruitment process to ensure that vulnerable workers are not being exploited by third parties seeking to profit from heightened demand.

### Emerging risks

In the context of a rapidly changing landscape during the coronavirus pandemic we continually assess our supply chain and where appropriate to undertake new risk assessments or reconsider the prioritisation of previously identified risks.

As part of these risk assessments, the business has considered which parts of its workforce may be particularly vulnerable and continually update our Board of Directors on emerging or heightened risks through internal systems and processes.

### Approval

This statement has been approved by the Totally plc Board on 7 September 2020. The Board will review and update the statement annually.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

Signed by: *Wendy Lawrence*

Name: Wendy Lawrence

Designation: Chief Executive

Date: 7 September 2020

END