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## Our response to the Modern Slavery Act

### Totally plc Modern Slavery Act Statement

#### Introduction

This statement includes all legal entities within and associated to Totally plc as the parent company (sometimes referred to in this statement as “the Group” where relevant). This statement relates to actions and activities during the financial year ending 31st March 2023 and is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the ‘Act’).

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

The Group is committed to conducting business ethically and responsibly and fully support the aims of the Act and associated standards. We are committed to tackling slavery and human trafficking wherever we can.

The Board will review and oversee implementation of the modern slavery statement. It sets the Group approach for modern slavery compliance by our staff across the business functions. The Executive Team manages the composition and publication of our annual statement and provide updates to staff as well as the Board.

#### Our commitment

- Totally is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. We acknowledge the role that we can play to help to bring this about.
- We are an equal opportunities employer, fully committed to creating and ensuring an inclusive and respectful working environment for all our staff. We want all our staff to feel confident that they can report concerns without any risk to themselves.
- Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.
- We recognise that, as a purchaser of goods and services, we have the opportunity to influence good practices in the employment of people by other organisations.
- We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.
- In addition to publishing our modern slavery statement on our website we will add this to the Home Office modern slavery statement registry.

Here are the steps Totally has taken and continues to take to understand and minimise the potential risk of modern slavery in its business and supply chains.

### Organisational Structure and Supply Chains

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

The Group consists of multiple services:

- **Urgent Care** (including Vocare Limited and Greenbrook Healthcare Limited)
- **Elective Care** (including Pioneer Healthcare Limited (incorporating Totally Healthcare Limited), Premier Physical Health Limited and About Health Limited)
- **Corporate Wellbeing** (Energy Fitness Professionals (also known as Energy Fit-Pro))

Totally has internal governance hierarchy structures in place. The Board of Directors of Totally plc are responsible for ensuring the hierarchy of its services meet good corporate governance standards around Clinical, Finance, HR and OD, Corporate, Environmental and Social governance.

The Group operate services at multiple operating sites across all regions within the UK and Ireland. The Group operates numerous contracts with the NHS as well as other public and private sector organisations.

### Our supply chains

We procure goods and services from the UK and a limited number of overseas suppliers. Where possible we make full use of approved appropriate Procurement Frameworks.

We build relationships with our suppliers to ensure they understand our values, and comply with our expectation and commitment to protect human rights and the environment. As part of our procurement processes, we require all of our suppliers to comply with our Supplier assessments and the requirements of the Modern Slavery Act and include appropriate contractual obligations within our commercial agreements.

Through our Supplier assessment, we require organisations tendering to work with the Group to confirm that they have fulfilled their statutory requirement to have produced a Modern Slavery Statement if they meet the criteria to do so.

### 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 and supported by our supplier code of conduct.

## Our policies which relate to the Modern Slavery Act 2015

The following policies are available to all staff through the staff intranet:

- Code of conduct
- Dignity at Work
- Whistleblowing
- Recruitment and Selection
- Equality, Diversity & Inclusion
- Disciplinary Procedure
- Procurement Policy

These policies set out the standards required of our staff and include details of the mechanisms in place which can be used report issues or concerns about Modern Slavery linked to our organisation.

## 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. Our risk assessment is applied to all new suppliers joining the business. Assessment of suppliers' criticality to Totally plc is based on what they are supplying and how we are using it. This has been generated referencing the recent NHS resilience framework toolkit. Depending upon risk, this impacts how we manage them moving forwards.

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 fresh 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.
- 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 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 will 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 and exploitation website helpline at [Modern Slavery Helpline](#)

## Approval

This statement has been approved by the Totally plc Board on 1 September 2023. 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: 

**Name:** Wendy Lawrence

**Designation:** Chief Executive Officer

**Date:** 21 September 2023

**Next review date:** September 2024

STATEMENT END

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