



Working together to improve the wellbeing of your workforce and your bottom line.

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Modern Day Slavery Statement

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Last Reviewed: 04 Jan 2021
Review due: 04 Jan 2022



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This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that BMR Health and Wellbeing has taken, and is continuing to take, to make sure that modern slavery or human trafficking is not taking place within our business or supply chain during the year ending 31/12/2021.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. BMR Health and Wellbeing has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the company or our supply chain.

About BMR Health and Wellbeing

BMR is a workplace mental health and wellbeing consultancy providing training, advice and tools to organisation to support systemic workplace wellbeing programmes. There are two main directors within the organisation and approved subcontractors are used as and when required. e

Products include MHFA England training sourced from the UK supplier - An established CIC organisation. In addition, we purchase consultancy work and use other accredited training providers from the UK-approved instructor network. In addition, our SAAS products are sourced from Perth, Western Australia.

Responsibilities of Management

Responsibility for ensuring the effective implementation and operation of the arrangements will rest with the Directors and any Managers who will ensure that they and their staff operate within this policy and arrangements and that all reasonable and practical steps are taken to avoid modern-day slavery practices infiltrating the company.

Each manager will ensure that:

- All their staff are aware of the policy and the arrangements, and the reasons for the policy;
- Concerns are dealt with properly, fairly and as quickly as possible;
- Proper records are maintained.



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Human Resources / Head Office will be responsible for monitoring the operation of the policy in respect of employees and job applicants, including periodic audits.

Responsibilities of Staff

Responsibility for ensuring that the company avoids modern day slavery rests with all staff and the attitudes of staff are crucial to the successful operation of fair employment practices. In particular, all members of staff should:

- Make themselves aware of, and comply with this policy and arrangements;
- Inform their manager if they become aware of any practice or instance that potentially involves exposure to modern day slavery
- Conduct due diligence in all recruitment and contract negotiations.

Policies in relation to slavery and human trafficking

We will:

- Examine internal business procedures to avoid making demands of suppliers or subcontractors that might lead them to violate human rights, including children's rights. These types of demands include insufficient or late payments, and late orders or high-pressure deadlines resulting from poor demand forecasting.
- Ensure that zero tolerance for modern slavery and respect for human rights, including children's rights, are built into contracts and represented in dialogue, self-assessment, audits, training and capacity-building opportunities for suppliers, subcontractors, customers, and other business partners.

Due diligence processes

Many human rights breaches, including modern slavery, are not immediately apparent. In fact, some suppliers may even go to great lengths to hide the fact that they are using slave labour.

We will:



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1. Ask all of our suppliers to provide evidence of compliance to our code of conduct by agreeing to the following statement:

“The contractor warrants that it has thoroughly investigated its labour practices and those of its direct suppliers to ensure that there is no slavery or forced labour used anywhere in its organisation or used in any of its direct suppliers’ or subcontractors’ organisation. The contractor further warrants that it has put in place all necessary processes, procedures, investigations and compliance systems to ensure that the warranties made above will continue to be the case at all times. BMR reserves the right to audit your supply chain at any time, with prior notice if it has reason to suspect that the above requirements have not been met.”

2. Not knowingly support or deal with any businesses involved in slavery or human trafficking.
3. Pay all employees at least the national minimum wage/national living wage (as appropriate, or London Living Wage for London only) currently in operation
4. Ensure our supply chain pay all employees at least the national minimum wage/national living wage (as appropriate, or London Living Wage for London only) currently in operation
5. Assess the physical appearance of candidates or current employees/staff at interview and/or other arranged meetings/appointments; whilst maintaining an awareness of the signs of psychological abuse (i.e. malnourishment, unkemptness, those that appear withdrawn/fearful or who wear the same clothes daily)
6. Record details of persons who do not have, or have difficulty in producing, their own personal identification and/or other documents/records, or have to seek these from other persons;
7. Monitor registered addresses of personnel using electronic systems to ensure employees / staff who have not declared themselves as family or marital/civil or other partners, are not residing at the same address unless a reasonable justification exists.
8. Operate a policy whereby all employees/staff must arrange and discuss their employment / work / assignments / patterns / availability etc. directly with the company themselves, and not through a third party, unless a suitable justification exists.



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Risk assessment and management

Vulnerable Populations	
We do not employ migrant or low skilled workers	1%
Business Model	
We do not outsource labour management	1%
Product or Service	
We provide/ hire service sector workers	1%
Geographies	
We do not source from countries where the rule of law or human rights are weak	1%
We do not pay wages in cash	1%
Yes = +20%	
No = +1%	
Total Risk Factor = 5%	

Key performance indicators to measure effectiveness of steps being taken

1. Staff turnover
2. Staff progression
3. Personal Development and appraisal meetings
4. Salaries paid electronically to named bank account

Training on modern slavery and trafficking

Briefing sessions will be held for new staff on modern-day slavery and equality issues as part of an induction programme. These will be repeated as necessary.

Training will be provided for managers on this policy and the associated arrangements. All managers who have an involvement in the recruitment and selection process will receive specialist training.



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Review

The effectiveness of this policy and associated arrangements will be reviewed as part of Financial Year End under the direct supervision of the Company Chief Executive.

Signed by[Director] *sheila lard*
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Print:
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Date: 04 Jan 2021