

1. Introduction

Modern slavery is the illegal exploitation of people for personal or commercial gain. It takes various forms, such as slavery, servitude, forced and compulsory labour, debt bondage and human trafficking, often in horrendous conditions from which the victim cannot escape. All of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Businesses have a key part to play in the effort to tackle this crime and protect vulnerable workers from exploitation. BES Healthcare Limited have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chains.

Section 54 of the UK Modern Slavery Act (2015) requires commercial organisations that operate in the UK and have an annual turnover above £36m to produce a Slavery and Human Trafficking statement each year.

2. Statement

We do not have an annual turnover above £36m, so therefore are not required under this legislation to produce a yearly statement. However, we choose to voluntarily produce a statement.

The Modern Slavery Act specifically states that any statement must include 'the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business'

We cannot guarantee that the entire supply chain is slavery free, and this is not a requirement, but we will demonstrate the steps we have taken to assess risk and mitigate those.

3. Organisational Information

BES Healthcare Limited supply Assistive Technology and Infection Prevention products and services to healthcare providers across the UK and Ireland.

BES Healthcare Limited operates with a staff of approximately 25 full-time equivalent employees. Our head office is in Bristol, and we have UK-wide coverage via regional sales and service personnel.

4. Our Supply Chain and Procurement

BES Healthcare Limited performs multiple roles as an 'economic operator.' These include manufacturer of our own product range, along with being a product importer and distributor of finished goods from other manufacturers in the EU and North America. Our supply chains reflect the diverse nature of the business.

As a manufacturer, we currently have a supply chain of sixteen Tier 1 suppliers for product components. Fifteen of these are UK based suppliers with one overseas supplier. Almost without exception, each of these Tier 1 suppliers will deal with a Tier 2 supplier.

Where BES Healthcare operate as an importer or distributor our supply chain involves over twenty Tier 1 suppliers. These are primarily UK based suppliers however we also have EU based suppliers from Italy, Poland, Belgium, Ireland, Germany, and Denmark with three suppliers from the USA and Canada.

In total BES Healthcare has over forty Tier 1 suppliers of products and services into the business.

BES Healthcare Limited are committed to ensuring transparency in our own business and our supply chains and expect the same due diligence and commitment from our suppliers, contractors, and business partners.

When procuring goods or services we have processes in place to consider Modern Slavery risks. We ensure we carry out supplier due diligence.

This includes:

- Robust supplier selection and policies
- Supplier questionnaire and audit
- Mapping of the supply chain to identify geographical areas of higher risk
- Requiring high risk suppliers, as part of the contract, to adhere to modern slavery policies and principles

We require our suppliers, as part of the selection process and yearly auditing, to confirm adherence to our Ethical Trading, Human Rights and Labour Standards Policy and we have a Supplier Code of Conduct in place.

We also avoid purchasing practices that can increase the risk of suppliers resorting to poor practices.

Such as:

- Aggressive pricing that does not consider sustainable production costs
- Short lead times and late high-volume orders
- Inaccurate forecasting
- Late or extended payments
- Withdrawing from contract at the last minute
- Enforcing unfair penalties for not meeting orders
- Making last minute changes to order specifications or volumes
- Providing inaccurate specifications

5. Areas of risk identified within the business and supply chain

At the point of writing this Modern Slavery Statement areas of risk identified within the business and supply chain relate to manufacturing which is an identified risk factor. Manufacturing of components and or finished goods within the BES Healthcare supply chain takes place in multiple geographical regions including the UK, EU, North America, and China.

BES Healthcare Limited does not employ agency staff.

Supplier risk assessment:

- The risk level is determined using the scale according to the global slavery index. <https://www.globalslaveryindex.org>
- This is cross referenced with the list of goods from the US department of Labour that have been identified to be at higher risk of being produced by child or forced labour. <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>
- Then the sector is checked against the [ILO's Global Estimates of Modern Slavery](#)

Findings:

1. 1 supplier identified as medium risk
2. 0 High Risk suppliers on the risk assessment
3. 40 suppliers are in manufacturing, an identified risk factor

Assessment Criteria:

- 0 or 1 Risk factors – Low Risk
- 2 Risk factors – Medium Risk
- 3 Risk factors – High Risk

Tier 1

The nature of the organisational structure means that the risk within the business and supply chain for Tier 1 is identified as Low Risk.

For our core product suppliers, we conduct a yearly self-assessment questionnaire.

The additional suppliers in the UK are continually reviewed as part of our ISO 9001 Quality Certification within our internal audit process and is also documented in our management review meetings minutes. This risk level will be reviewed yearly and reported on.

Tier 2

We are currently in the process of reviewing our Tier 2 suppliers to further identify potential risks within the supply chain.

These will be reviewed yearly and reported on.

6. Policies and Processes relating to Modern Slavery

BES Healthcare operate the following due diligence processes to help manage and prevent risks of modern slavery.

- Ethical Trading, Human Rights and Labour Standards Policy
- Supplier Audit
- Supplier Code of Conduct
- Whistleblowing

KPIs

We will use key performance indicators (KPIs) to measure how effective our actions are to identify and address modern slavery practices in any part of our operations and supply chains have been.

Below are the key performance areas that we assess:

1. Governance & due diligence
2. Procurement & supply chain
3. HR practices, training & education

Against each of these focus areas we have developed KPIs that are used to assess the effectiveness of our actions. These include:

1. The number of modern slavery cases identified and remediated
Update of the Modern Slavery Statement and completion of the MSAT yearly
2. Number of suppliers completing our supplier self-assessment audit with the inclusion of modern slavery questions
NB: (medium or high-risk suppliers to complete questionnaire annually; low risk suppliers to be audited every 2 years).
3. Completion rates for modern slavery awareness training

Over subsequent reporting periods, we will continue to review and enhance these KPIs where necessary and where appropriate develop further metrics to assess the effectiveness of our actions, in line with continuous improvement. This will be captured and logged within our Management Reviews.

7. Training of employees around Modern Slavery

We provide third party independent training on Modern Slavery through 'Tick the Box Compliance Solutions' to employees.

The training covers:

- The ILOs Forced labour indicators
- The training ensures that recipients understand
 - Indicators of modern slavery
 - How to report suspicions of modern slavery
 - The modern slavery statement requirements
 - How to consider modern slavery risks in procurement
 - How to be better equipped to undertake modern slavery due diligence for the organisation

The training is delivered via e-learning and participants are required to pass the course using a competency-based exam.

The training is mandatory, and a recertification is provided for staff every 12 months.

8. Reporting

If a case of Modern Slavery is suspected, then the following is advised.

A suspected victim of modern slavery is not to be confronted directly as this may endanger them.

If an immediate risk to life, then call local emergency (e.g. 911 in the US, 112 in Europe, 999 in the UK).

In the UK, if there is no immediate risk to life, then the Modern Slavery Helpline is to be called on 08000 121 700 or it will be reported online at [Modern Slavery Helpline](#).

or

If wider - If there is no immediate risk to life, then contact the national helpline or report it online.

If also USA and Europe the following resources are available.

Helpline and On-line Reporting

Country	Helpline	Phone	On-line
EU	Anti-trafficking hotline	See https://www.europeanfreedomnetwork.org/hotline/	
UK	Modern Slavery Helpline	08000 121 700	https://www.modernslaveryhelpline.org/report
US	National Human Trafficking Hotline	1-888-373-7888	https://humantraffickinghotline.org/en/report-trafficking

Employees are required to take their suspicions to their line manager.

If there are concerns around modern slavery with any of our suppliers we will first look to work with them to remedy the situation with an improvement action plan implemented and more rigorous auditing of the organization.

If the response from any of our suppliers, here in the UK or abroad, seems inadequate and appropriate measures are not put in place to address coercion, threat, abuse, and exploitation of workers, then we would look to give that company more support, guidance, and incentives to tackle the issue. This could include working with at-risk suppliers to provide training, messages and business incentives or guidance to implement anti-slavery policies.

If modern slavery is identified or suspected abroad, and resolution is not possible with the supplier, then we will engage with local Non-Governmental Organisations, industry bodies, trade unions or other support organisations to attempt to remedy the situation. If warranted, we will contact local government and law enforcement bodies. Our approach will always consider the safest outcome for the potential victims while also remember the economic influence and control which the organisation holds over those who may be committing these crimes.

If, after receiving support, the supplier is not taking the issue seriously, and it remains unresolved, then we will reconsider our commercial relationship with that supplier. These actions would then be included in the next statement produced.

9. Breaches

Any employee who breaches this statement will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Any suppliers, individuals or organisations working with us, or on our behalf who breach this policy may have their relationship or contract with us terminated.

10. Responsibility

The BES Healthcare Board of Directors is responsible for this Modern Slavery Statement.

11. Review and Communication

This statement will be reviewed by senior management, signed by a director or equivalent and then published on our website, and also uploaded to the following register:

- <https://modern-slavery-statement-registry.service.gov.uk>

Internally it will be sent to all employees and sent to our supply chain and other interested stakeholders.

12. List of Appendices and Associated Forms

- Supplier code of conduct
- Supplier questionnaire
- Ethical Trading, Human Rights and Labour Standards Policy

13. Board / Senior Management Approval

SIGNED: 

NAME: Diane Hargrove

JOB TITLE: Managing Director

DATE: 3rd December 2024

Document title:	Modern Slavery Statement	Release date:	3 rd December 2024
Issue number:	001	Review date:	December 2025