



**Simplyhealth**

All together healthier

# Modern Slavery and Transparency in Supply Chains

Statement 2022

## Purpose and scope

This Modern Slavery and Transparency in Supply Chains Statement (“Statement”) is made in accordance with section 54 of the Modern Slavery Act 2015 (the “Act”) for the financial year ended 31<sup>st</sup> December 2021. The Statement is made by Simplyhealth Group Limited (company number 05445654) on behalf of itself, Simplyhealth Access (company number 00183035) and Denplan Limited (company number 01981238). This Statement is reflective of their practices. (together “Simplyhealth”).

This is the fifth statement made by Simplyhealth since the Act came into force and reports on the efforts made to mitigate the risks of modern slavery in line with the requirements of the Act.

This Statement sets out the steps that Simplyhealth continues to take to prevent modern slavery and human trafficking in our business and supply chains.

Simplyhealth supports the proposed changes outlined in the public consultation “Transparency in Supply Chains”, these being: publication of our statement on a central Government registry; a single reporting deadline; mandating the information to be included in our Statement; and civil penalties for failures to comply.

## Who we are

Simplyhealth Group Limited is the parent company of Simplyhealth Access and Denplan Limited.

Simplyhealth Access is the UK’s leading

health cash plan provider, providing access to everyday healthcare. Simplyhealth is a trading name of Simplyhealth Access, which is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

Denplan develops, sells, and administers dental payment plans which are sold by dentists to their patients.

Simplyhealth’s purpose is to improve access to healthcare for all in the UK. We make accessing healthcare easier for millions of people in a sustainable way that delivers long term impact.

As at 31 December 2021, Simplyhealth had circa 970 staff working across the group. 90% of staff were employed on permanent employment contracts, 7.6% on fixed term contracts and 2.4% via approved agencies.

## What we do

We arrange insurance based health plans that help people access and get funding for healthcare. We also provide charitable giving and colleague volunteering to help local and national healthcare charities that support adults and children in accessing healthcare.

Since 1872, we’ve been helping people make the most of life through better everyday health. Our plans make sure individuals, families and employees can easily access in-person and virtual wellbeing services, and can afford to stay healthy by claiming costs back on physiotherapy treatments, dental visits to the optician, complementary therapies and more.

Our plans also provide 24/7 video GP appointments, 24/7 counselling support and advice, cover for routine prescription costs, video physiotherapy assessment and virtual healthcare treatments.

We provide direct to the consumer, via corporate employee benefit schemes, or via health practitioners themselves.

## Our approach

The statutory directors of each company within our group are strongly committed to tackling the issue of human trafficking and modern slavery in our supply chains and have overall responsibility for ensuring that Simplyhealth complies with its legal and ethical obligations. These directors receive updates on the nature and requirements of the Act, and the impact on our group annually.

We maintain clear internal governance structures at both operational and leadership levels. Our senior leaders (in conjunction with our procurement function) remain responsible for engagement with our modern slavery processes and procedures.

We continue to tackle modern slavery and human trafficking by educating and informing our employees, making clear commitments, progressing against those commitments and owning the challenges faced. This Statement is once again written in the spirit of transparency; it acknowledges that while we have progressed, we are committed to continually improving our practices.

Simplyhealth remain registered with the Home Office contact database to receive reporting guidance and resources. In

reviewing our approach, we have had regard to the latest governmental guidance.

Our operations have not undergone any material change since the last Statement, and while Simplyhealth continues to require compliance with the Act from our suppliers by the use of clear terms and conditions in supplier contracts and pre-contractual checks, there has by necessity, been limited modification in our approach.

All of our policies and procedures remain under review and adaptable to any changes in risks faced by Simplyhealth.

## Supply chains

Simplyhealth currently has 462 contracted suppliers, the majority of which are based within the UK. The others are based within the EU and the U.S.A. U.S.A suppliers are predominantly IT software suppliers.

Simplyhealth continues to source goods and services for internal operations, our business customers and consumers from suppliers on our Approved Supplier List (“ASL”).

Suppliers are added to the ASL following successful completion of Simplyhealth's standard supplier pre-contractual checks. By way of a checklist within our control framework, we can evidence that appropriate procedures are in place to manage the risk of modern slavery and human trafficking.

We also require suppliers to:

- accept our modern slavery provisions in our standard supplier terms and

conditions to ensure our suppliers manage their own supply chains in a way that matches our zero tolerance approach;

- complete our Modern Slavery Act Supplier Request Form, which requests details regarding a supplier's arrangements to prevent modern slavery in its organisation and supply chains; and
- share our values as set out in our Corporate Social Responsibility Statement.

We believe that effective procurement at Simplyhealth includes ethical, socially responsible behaviours in all supplier interactions including:

- engagement and compliance with the Bribery Act 2010 and all other legislation relating to anti-corruption;
- engagement and compliance with the Modern Slavery Act 2015;
- engagement and compliance with outsourcing regulatory requirements;
- commitment to diversity and inclusion; and
- avoidance (or declaration) of any conflict of interest.

## Assessment of risk

Our procedures help minimise and mitigate against the risk of modern slavery occurring within our business and supply chains.

Our 2021 assessment did not identify any areas of concern and confirmed that we

have proportionate practices in place relative to the risk of slavery and human trafficking occurring in our business or supply chains.

Despite our business being self-assessed as low risk in respect of modern slavery and human trafficking, we repeatedly assess the risk of such practices occurring in our business and our supply chains through our procurement processes. We review our process with reference to Home Office guidance, and focus on recruitment, use of agency and temporary workers, on-boarding of new employees and terms and conditions.

Simplyhealth is not heavily reliant on third party suppliers. In recent years Simplyhealth's decreased reliance on external supply has reduced our overall risk.

We continue to rely on some outsourced services and are aware that there are modern slavery and human trafficking risks in these supply chains.

Our procurement function undertakes due diligence on all new suppliers regardless of size or global presence, and periodically reviews these suppliers. It is hoped that by compliance with, and promotion of, the Act we will play our part in influencing all suppliers in the way they manage their supply chains.

## Training, Guidance and Principles relating to Modern Slavery and Human Trafficking

- All employees within our procurement function undergo training to ensure that they have a full

understanding of the issues affecting Simplyhealth's business and its supply chain in relation to modern slavery and human trafficking.

- Our legal function has a full understanding of the impact of modern slavery and human trafficking, together with the need for our business to closely adhere to the Act, with a purposive approach, not merely at a compliance level. Our legal team ensure that our supplier due diligence and standard terms and conditions are fit for purpose.
- We believe that our strength is in our people and their vigilance will ensure successful engagement. As such all employees have access to our modern slavery and human trafficking documentation via our corporate intranet.
- We have provided guidance to our employees regarding our corporate duties and our expectations in relation to employee action and awareness. The guidance includes links to the Modern Slavery Helpline website, the government modern slavery website and this statement; together with information regarding internal communication and reporting. This guidance is reflective of our zero-tolerance approach.

### **The following supplementary principles and toolkits are available to all employees:**

- Running our Business – we have a Whistleblowing Policy in place to allow all employees to report any

concerns about how their colleagues are treated, or to report any concerns regarding our business practices. This includes any circumstances that may give rise to a risk of, or a suspected event of, modern slavery or human trafficking. Our whistleblowing toolkit is designed to make it easy for employees to make disclosures without fear of retaliation;

- Our People – we strive for the highest possible standards of employee conduct and ethical behaviour as laid out in Our People Principles;
- Employment practice – we have in place, and maintain, policies and procedures which align to the requirements of applicable employment law;
- Apprentices – all our apprentices are paid in line with our internal pay scales, all wages exceed the National Living Wage;
- Agency Workers – we use only specified, reputable employment agencies to source labour, and we always verify the practices of any new agency we are using (ensuring that they meet our standards) before accepting workers from that agency. Simplyhealth only works with providers who have their own robust internal audit measures to assure adherence to safe and fair modern working practices. We give clear guidance on the behaviours and actions we expect and all providers adhere to our Terms of Business which requires adherence to the Act; and

- Our approach to corporate social responsibility underpins how the organisation takes account of the economic, social and environmental impact of our operation.

## Evaluation and the year ahead

To evaluate the effectiveness of the measures we are taking, our process owners are responsible for modern slavery and human trafficking engagement, and publicising this across the group. We have maintained a framework for organisational accountability, to allow our people, and others, to raise issues, make suggestions, voice grievances and report suspected or actual modern slavery or human trafficking. We have raised awareness internally of the risks of modern slavery and human trafficking, and highlighted the requirements of the Act and its objectives, together with our procedures to ensure compliance.

For the period covered by this statement, Simplyhealth did not receive

any reports of modern slavery within its business or its supply chain.

As a business, for the year ahead, we will:

- aim to map our supply chains for goods and services assessed as potentially higher risk, with reference to the Global Slavery Index.
- monitor updates around proposed changes to legislation relating to modern slavery;
- monitor the evolving situation in Ukraine;
- develop our Supplier Code of Conduct which contains Simplyhealth's modern slavery principles; and
- develop our Vendor Management Framework, which will incorporate our approach to modern slavery.

Approved by the Board of Simplyhealth Group Limited on 27<sup>th</sup> June 2022



**Sneh Khemka**  
Chief Executive



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