Miller Insurance Services LLP (Miller)

Slavery and human trafficking statement 2023 pursuant to section 54(1) of the Modern Slavery Act

Under the Modern Slavery Act 2015 ('MSA'), commercial organisations operating in the United Kingdom are required to set out, in a publicly available statement, their commitment to comply with the Act and provide information to show the steps taken not only to mitigate the risk of modern slavery occurring within their organisation but also their commitment to considering such risks arising in the wider supply chains. This statement is in respect of the financial year to 31 December 2022.

Paragraph 7.6 of the MSA provides updated guidance, which strongly recommends that businesses who produce a statement in one financial year should continue to produce a statement in future years.

The updated guidance adds a definition of child labour and highlights the point that child labour will not always constitute modern slavery. The emphasis in the updated guidance on child labour means that organisations must be particularly vigilant on the incidence of child labour in their supply chains. Miller recognises this risk and is committed to ensuring that its policies and procedures reflect the need to ensure such instances cannot occur.

This document is Miller's seventh MSA statement and shows Miller's ongoing commitment to ensuring there are no instances of modern slavery or child labour within the organisation and, also, within its wider supply chains.

Organisational Structure

Miller is a leading specialist (re)insurance broking partnership, headquartered in London with more than 650 people across its UK and international operations.

Miller and its subsidiaries are committed to ensuring that there is no slavery or human trafficking within its own business and supply chains. Miller is committed to acting ethically and with integrity in its business relationships and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking is not taking place in any stage of the supply chains.

Given the nature of its business, its role as an intermediary in the insurance distribution chain and the entities with whom Miller trades, Miller's Board and management teams consider that there is minimal risk, however, this does not reduce our commitment to monitor the position and ensure adherence to our commitment to uphold the policies and procedures in place to safe guard against slavery or human trafficking practices.

Policies relating to the Act

Miller has a robust and comprehensive whistleblowing policy,which has been updated to include circumstances that may give rise to human trafficking or modern slavery.

Similarly, our procurement policy is reviewed and updated to ensure it is in line with our obligations under the MSA. Although we believe, due to the nature of our business and for the reasons set out in our original statement, we are not directly exposed to a high risk of modern slavery or child labour, we would want and expect our suppliers, regardless of geographical location, to comply with local and national laws and regulations.

Our procurement policy requires our suppliers to comment on their own obligations arising from the MSA and provide evidence of their code of conduct/related policies in this regard, in order that we can assess their procedures to ensure that there are no instances of modern slavery or child labour in such organisations and respective supply chains.

We are confident that our anti-slavery policy is in line with our obligations.

Recruitment

We have a comprehensive recruitment process in place to ensure that we comply with relevant UK employment law and we continue to monitor this to ensure ongoing compliance with the MSA. We carry out reference checks on hires and complete identification checks for new joiners to ensure that they have the right to work in the UK. Robust processes ensure that employees are of age and status.

Training

Miller understands the importance of maintaining effective internal measures to ensure human trafficking and modern slavery is not supported at any level of the business.

We have created bespoke e-learning training to inform partners and members of staff what the MSA is designed to address. In addition to this training, we will continue to direct those partners and members of staff to modernslavery.co.uk and explain how this site provides effective guidance on recognising the different types of potential slavery and how to deal with it.

This statement has been approved by the Managing Member of Miller Insurance Services LLP.

James Hands
Chief Executive Officer
On behalf of the Managing Member of Miller Insurance Services LLP