



Modern slavery and human trafficking statement 2023/24

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Modern Slavery Statement

Modern slavery refers to the exploitation of people who have been forced, deceived or coerced into labour and servitude. This statement, made pursuant to section 54(1) of the Modern Slavery Act 2015, sets out Ascenti's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at identifying risks of modern slavery or human trafficking in its own business and its supply chains and ensuring that processes are in place to ensure that Ascenti does not engage with either directly or indirectly modern slavery or human trafficking practices in either the United Kingdom or overseas. This statement relates to actions and activities during our financial year between December 2023 and November 2024.

Ascenti Health is committed to acting ethically and with integrity in all business interactions, and to implementing policies and processes and actively working to ensure fair and equitable practices are in place.

As part of the healthcare sector, Ascenti recognises that it has a responsibility to take a robust approach to modern slavery and human trafficking. Ascenti is absolutely committed to preventing modern slavery and human trafficking in its own activities, and ensuring that those in its supply chains and contractors are reviewed and vetted for compliance with modern slavery legislation, and comply with our values.

Organisational structure and supply chains

This policy covers the activities of bd-c Incline Midco Limited, bd-c Incline Bidco Limited, Ascenti Health Limited, Ascenti Physio Limited, Advo Health Limited, Six Physio Limited, Lacoda Limited and all members of the Ascenti Group.

Ascenti Physio is a provider of rehabilitation services nationwide to insurers, employers, the NHS, personal injury and private patients.

Advo Health delivers the Government's Health Assessment Advisory Service (HAAS) carrying out functional assessments for the Personal Independence Payment (PIP) and Work Capability Assessment (WCA)

Six Physio and its subsidiaries provide specialist physiotherapy services across London and the South to private patients and via private medical insurance.

The Ascenti Group's head office is in Fareham but operates nationwide.

The Ascenti Group currently only operates in the United Kingdom and collectively the Ascenti Group has an annual turnover of £58m.



Ascenti's supply chain mainly comprises referral physiotherapy and treatment providers instructed to provide physiotherapy, mental health, and related services. Our supply chain also comprises suppliers, as expected, in the running of offices and healthcare and assessment clinics, including facilities services, recruitment agencies, training and equipment providers.

Risk Assessment and Management

Ascenti maintains a risk management framework aimed at identifying and assessing risks which impact on our operations. A risk-based approach is applied to engaging with new suppliers/renewing contracts. This is to ensure both compliance with legislation and alignment with our values.

Ascenti does not believe it is engaged in any activities or is involved with any suppliers in countries which have been identified as being at high risk in relation to modern slavery or human trafficking.

Responsibility

Overall accountability for Modern Slavery sits with the Chief Financial Officer and responsibility delegated to the Head of Group Risk and Compliance.

The Executive Forum which has direct oversight of Modern Slavery is the Integrated Governance Forum which is a group wide, Executive driven forum covering key topics of quality, governance and compliance impacting on all business units within the Ascenti Group Structure.

Policies of relevance to modern slavery and human trafficking

Ascenti operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- Code of Conduct: Ascenti has a Code of Conduct published on its [website](#) to ensure that suppliers are aware of our expectations and fundamental principles, and that these should extend into their own businesses and supply chain.
- Social and Sustainability Strategy and Policy: This strategy sets out our aims and objectives in ensuring we reduce our environmental burden, enhance the livelihoods of our people and in the responsible utilisation of our resources. This specifically includes our commitments to managing modern slavery risks and ensuring sustainable supply chains.
- Whistleblowing policy: Ascenti encourages all its staff, clients and other business partners to report any concerns related to the direct activities or supply chains of Ascenti. This includes any circumstances that may give rise to an enhanced risk of modern slavery or human trafficking. Ascenti's whistleblowing procedure is designed to make it easy for staff to make disclosures without fear of retaliation.
- Behaviour at work policy / Equal opportunities policy: Ascenti's policies make clear to staff the actions and behaviours expected of them when representing Ascenti. Ascenti strives to maintain the highest standards of employee conduct and ethical behaviour ensuring fair and equitable opportunities, including when operating abroad and managing its supply chain.

Due diligence



Ascenti has committed to undertaking due diligence activities when engaging new suppliers, and regularly reviews its existing suppliers. Ascenti's due diligence processes include:

- Broadly considering suppliers to assess particular product or geographical risks of modern slavery and human trafficking;
- Checking whether a business has a Modern Slavery and Human Trafficking Statement, and what policies they have in place;
- Evaluating the modern slavery and human trafficking risks of each new supplier;
- Taking steps to improve substandard supplier practices, including providing advice to suppliers and requiring them to implement action plans;
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan, including the termination of the business relationship;
- Ensuring contractual controls are in place with suppliers in relation to complying with legislation, including Modern Slavery and Human Trafficking.

Training

Ascenti is required to ensure that staff are aware of the requirements surrounding modern slavery and human trafficking and include mandatory modern slavery training for all employees to be completed on an annual basis. Compliance with training is monitored and reported upon via our established Integrated Governance Forums.

Key performance indicators

In order to assess the effectiveness of our approach to modern slavery, the inclusion within our Social and Sustainability Strategy includes measurable and reportable key performance indicators. This work falls within the remit of our Integrated Governance Forum and is included within our annual workplan for review and oversight.

A process of continual improvement exists within Ascenti Health to ensure currency of our approach and making changes and enhancements where necessary to continue to mitigate the risks associated with modern slavery and human trafficking.

Ian Thistlewood
Chief Executive Officer