

# **Anti-Slavery and Human Trafficking Statement**

#### Introduction

We're committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains in accordance with the Modern Slavery Act 2015.

# Our structure, business and supply chains

We're a housing association providing homes and services within local communities. We have approximately 850 staff. We manage and maintain around 30,000 affordable homes for rent or purchase. We're planning to develop around 1,250 new homes each year.

Our supply chain includes material suppliers for property maintenance, house building and supporting services.

#### What we did in 2017/2018

#### **Tenders**

We communicated our zero-tolerance approach to modern slavery to new suppliers, contractors and business partners and obligated them to complete mandatory online assurance that they're complying with the Modern Slavery Act 2015 before they could join our supplier base.

#### Current suppliers, contractors and business partners

We started the process of combining and rationalising the two sets of suppliers from legacy organisations and are in the process of collecting initial supplier assurance that they're complying with the Modern Slavery Act 2015.

#### Safeguarding

We implemented refreshed Safeguarding policies in April 2018 which address modern slavery.

# What we will do in 2018/19

### Prevention

We shall...

- continue to monitor, assess and manage risks associated to slavery and human trafficking
- make all relevant pre-employment checks prior to employing staff
- obligate suppliers to complete an annual return confirming that they're complying with the Modern Slavery Act 2015 and terminate their status as an active supplier if they fail to do so
- subject all future transactions and tender activities to the legislation and reflect our commitment to acting ethically and with integrity
- publish this annual statement prominently on our website evidencing the actions that have been taken to reduce the risk of slavery and human trafficking from our business and supply chain
- train staff where appropriate.

# Reporting and handling of breaches

We shall:

- encourage reporting of serious concerns related to our own activities or supply chain and take necessary action
- report all attempted or actual breaches and their outcomes to the Audit & Risk Committee and Board.

# The Executive Team shall:

- have primary responsibility for implementing this statement, monitoring its use and effectiveness
- ensure internal control systems and procedures are effective in countering modern slavery.

Author	Owner	Date approved	Review date
Melanie Arstall	Duncan Brown	September 2018	September 2019