



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

The Modern Slavery Act 2015 consolidates various offences relating to human trafficking and slavery.

In broad terms:

- 'slavery' is where ownership is exercised over a person;
- 'servitude' involves coercion to oblige a person to provide services;
- 'forced or compulsory labour' is where a person works or provides services on a non-voluntary basis under the threat of a penalty;
- 'human trafficking' involves arranging or facilitating the travel of a person with a view to exploiting them.

Section 54 of the Act imposes a legal obligation on large commercial organisations to report on transparency in supply chains. This will require the publication of an annual slavery and human trafficking statement.

### **Introduction**

This statement sets out Alliance Homes Group's (AHG) actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and our supply chains. This statement relates to actions and activities during the financial year 1 April 2015 to 31 March 2016. It also contains key actions that we will be taking over the next 12 months and reporting on in 2017.

Working within the housing and care sectors, AHG recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

We are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

### **Organisational structure and supply chains**

This statement covers the activities of AHG:

- The Group offers a broad range of products to meet the housing needs and aspirations of our customers, based on their personal circumstances. This will include a range of housing solutions for those unable to access market priced housing.
- We work to make a positive difference to the lives of customers through strengthening communities, working in partnership with others to build capacity, create employment opportunities, and promote independence.
- We operate an active asset management strategy that seeks to maximise the effective use of capital, maintaining high accommodation standards and reducing fuel poverty.
- We will work to drive innovative service delivery solutions that enhance the customer experience and promote efficient and effective use of resources.
- In short, our Mission can be summarised as “*Improving lives for a better future*”.

The Group spends a significant amount of money on procuring goods, works and services. In procuring these services, via a supplier, social enterprise or another public sector supplier we want to maximise value and best practice. Our company auditors audit our supply chain requirements.

AHG is a registered society and social enterprise operating across the West of England.

- **Alliance Homes** manages 6,800 homes. It also delivers a range of projects to build stronger communities.
- **Alliance Living Support** has established itself as a market leader in support provision for vulnerable people. It is well placed to secure new delivery contracts across the region.
- **Alliance Living Care** promotes independent living by providing domiciliary care services, as a local authority partner and direct to the public.
- **Alliance Property Care** specialises in asset management, development, repairs and investment.
- **Alliance Ventures** is a national leader in environmentally friendly initiatives. It includes ownership of solar photo-voltaic panels installed on 1,700 properties and is a significant energy generator. Alliance Ventures will continue to investigate and implement initiatives that tackle fuel poverty and other new business ventures.

### *Risk*

Alliance Homes’ approach to risk management process is outlined in the [A Guide to Managing Risk](#) document. Its primary aim is to safeguard the assets of the company; ensure compliance with all statutory and regulatory requirements; and maximise the chances of achieving the corporate objectives.

### *High-risk activities*

We do not believe we have any activities that are considered to be at high risk of slavery or human trafficking.

### *Responsibility*

Responsibility for the AHG's anti-slavery initiatives is as follows:

- **Policies:** The Business Improvement Manager is responsible for managing and leading the development of new, and review of existing, policies and procedures across the AHG. All policies are subject to a sign-off process and include an Equality Impact Assessment. Modern Slavery impacts across a range of policies.
- **Risk assessments:** We state within our risk register that we will comply with all miscellaneous legislation, but will make specific reference to the MSA in the future. Production of our Modern Slavery statement will also mitigate some of our previously recognised risks e.g. 'Failure to demonstrate a positive approach to equality and diversity leading to low customer satisfaction.'
- **Investigations/due diligence:** Mazars our Internal Auditors have a forensics and investigations team who would look into any lack of probity. The work would be scoped and an appropriate fee charged.
- **Training:** Unseen (<http://www.unseenuk.org/>) have delivered sessions to staff on Understanding the needs of those affected by Human Trafficking for the last 2 years and will continue to be used in the future. Wider sessions have been delivered by the British Institute for Human Rights (BIHR) which have included the right to be free from slavery or forced labour.

### **Relevant policies**

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

- **Whistleblowing** Guidance forms part of our Counter Fraud and Bribery and Corruption Policy and our Standards and Probity Policy – link. We encourage all our staff, customers and other business partners to report any concerns related to the direct activities, or the supply chains of AHG. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing guidance is designed to make it easy for staff to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our confidential helpline.
- **Employee code of conduct** Our code of conduct makes clear to staff the actions and behaviour expected of them when representing AHG. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chains.
- **Procurement Strategy/Policy** Our Procurement Policy and Strategy details the processes we will follow in relation to procuring products and services, ensuring that we comply with all relevant legislation. It also details how we will seek to add Social Value to the contracts we procure. We are committed to ensuring that our suppliers adhere to the highest standards of ethics.

Contractors are required to demonstrate that they provide safe working conditions where necessary, treat staff with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the our supplier code of conduct will lead to the termination of the business relationship. Link to [Approved Contractors Standards](#) and to [Procurement Manual](#)

- **Recruitment policy** We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency we are using before accepting staff from that agency. Specific reference to the Modern Slavery Act will be made within the policy when it is reviewed at the end of 2016.

## **Due diligence**

AHG undertakes due diligence when considering taking on new suppliers, and regularly reviews our existing suppliers. Our due diligence and reviews include

- The Group's due diligence approach to Procurement is clearly outlined in our Procurement Strategy and Manual etc Link
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers if needs be and requiring them to implement action plans
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship

## **Performance indicators**

We have reviewed our key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, we will introduce and monitor the following KPI:.

- Instances of breaches of Modern Slavery Act = zero.
- Require all staff to complete awareness training on modern slavery by watching 'Modern Slavery is closer than you think' as part of their induction.

We will also take the actions as listed in our MSA Action Plan. We currently undertake periodic reviews of our compliance with all relevant legislation which would include the MSA.

## **Training**

We require all staff to watch the Governments Modern Slavery is closer than you think video in order to provide them with an awareness of modern slavery. This will be delivered via our online learning platform Olli. All staff are also provided with Modern Slavery: A briefing document.

More detailed modern slavery training is provided for staff involved in procurement and supply chains will continue to be delivered by Unseen.

Training will be developed and delivered to relevant staff to look at:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to identify the signs of slavery and human trafficking;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps should be taken if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

We also include our suppliers and contractors on any of our relevant training.

### **Awareness-raising programme**

As well as training staff, we will be raising awareness of modern slavery issues by distributing flyers to staff and circulating a series of emails/notices on our intranet site.

They explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within AHG; and
- what external help is available, for example through the Modern Slavery Helpline.

### **Board approval**

This statement has been approved by the AHG board, who will review and update it annually.

### **Chair of the Board signature:**

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### **Chair of the Board name:**

[ ]

### **Date:**

**Chief Executive Officer signature:**

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**Chief Executive Officer Name:**

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**Date:**