

Modern Slavery and Human-Trafficking Statement

Introduction

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.

This statement sets out Alliance Homes Group's (AHG's) commitment to understand all potential modern slavery risks related to our business and the activities 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 2017 to 31 March 2018.

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

The Modern Slavery Act 2015 (MSA) 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.

Organisational structure and supply chains

The Alliance Homes Group consists of NSAH (Alliance Homes) Limited (NSAH), Alliance Living Care Limited (ALC), Alliance Homes Partnerships Limited (AHP), Alliance Homes Design & Build Limited (AHD&B), Alliance Homes Sales Limited (AHS) and Alliance Homes Ventures Limited (AHV). NSAH is the parent company and is a registered society and social enterprise operating in the West of England.

- We manage 6,500 homes and deliver a range of projects to build stronger communities.
- ALC promotes independent living by providing domiciliary care services, as a local authority partner and direct to the public.
- AHP is a partnership that deliver home repairs with United Communities and Bristol Community Land Trust (BCLT). Through this partnership we deliver repairs to our existing 6,500 homes and an additional 1,800 homes in Bristol owned by United Communities and BCLT.

This statement covers the activities of AHG:

- AHG 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.
- We will strive to ensure that our properties are not used for slavery purposes through effective tenancy and property management. Our operatives and frontline staff are a key line of defence in preventing modern slavery.
- In short, our Mission can be summarised as “*Improving lives and benefiting communities*”.

AHG 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 auditors audit our supply chain requirements.

Risk

Our approach to risk management is outlined in the *A Guide to Managing Risk* document. Its primary aim is to safeguard the assets of the Group; 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 Group maintains a schedule that identifies a clear responsible lead for every policy within the Group. Each responsible individual ensures that policies are managed and leads the development of new, and review of existing, policies and procedures. 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 relevant law and now make specific reference to the MSA. Production of our Modern Slavery statement also mitigates 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:** 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.

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. We encourage our colleagues, customers and other business partners to report any concerns related to the direct activities, or the supply chains of The Group. 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 colleagues to make disclosures, without fear of reprisal. Colleagues, customers or others who have concerns can use our confidential helpline.
- **Employee code of conduct** Our code of conduct makes clear to colleagues the actions and behaviour expected of them when representing The Group. 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 colleagues 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 our supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment policy** We use only specified, reputable employment agencies to source employees and always verify the practices of any new agency before using them.

Due diligence

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

- AHG's due diligence approach to Procurement is clearly outlined in our Procurement Policy.
- 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 reviewed our key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. We monitor, through our KPIs, instances of breaches of Modern Slavery Act (requirement = zero). We also require all colleagues to complete awareness training on modern slavery by watching '*Modern Slavery is closer than you think*' as part of their induction.

We currently undertake periodic reviews of our compliance with all relevant legislation which includes the MSA.

Training

We ask all colleagues to watch the Government's '*Modern Slavery is closer than you think*' video in order to provide them with an awareness of modern slavery. This is delivered via our online learning platform. All colleagues can also obtain a Modern Slavery briefing document.

Training continues to be developed and delivered to colleagues including:

- Our business' 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.
- 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.

Awareness-raising programme

As well as training colleagues, we have raised awareness of modern slavery issues by distributing flyers to colleagues and circulating a series of emails/notices on our intranet site.

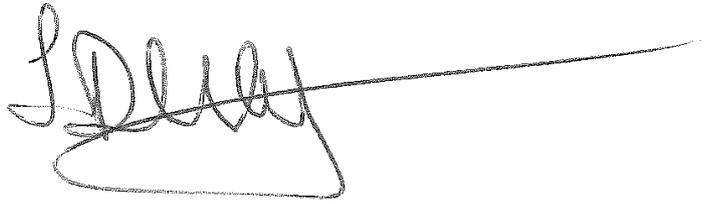
They explain:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what colleagues can do to raise 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 board of NSAH on behalf of the Group, who will review and update it annually.

Chair of the Board signature:

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Chair of the Board

SIMON SWEETINBURGH

Date:

12 February 2019

Chief Executive Officer signature:

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Chief Executive Officer:

LOUISE EMMA SWAIN

Date:

12 February 2019