

Procedure Title	Modern Slavery Policy Statement
Directorate	People and Learning
Author	Sian Leighton
Date	19 March 2018
Procedure Scope/Users	All MSV employees, board members, contractors and consultants

1. Introduction

Modern slavery is a crime and gross violation of fundamental human rights. It takes various forms, such as slavery, forced and compulsory labour and human trafficking. We are committed to acting ethically and with integrity and will ensure there is transparency in our business. We expect the same high standard from all our contractors, suppliers and other partner agencies.

This statement sets out the Mosscafe St Vincent's Housing Group Limited (MSV's) commitment to preventing slavery and human trafficking in all its business activities and within its supply chains. It outlines the steps we have taken to ensure compliance with the Modern Slavery Act (MSA) 2015 and minimise the risks of any association with practices which undermine the principles of safety and dignity for our customers and at work, particularly for people from vulnerable groups.

This statement covers our current position on modern slavery and actions proposed during the financial year 2018/2019.

2. MSV Housing's organisational structure, business and supply chain

This statement covers the activities of MSV, including its subsidiary companies and the supply chains it works with.

MSV is an amalgamation of two long established and respected community landlords who came together in July 2017. It is a non-profit making, registered provider of social housing employing approximately 270 people. We operate across the north-west of England and manage around 8500 homes. We have a commitment to build over 1200 new homes over the next

eight years.

The Group has an approved list of contractors, consultants and suppliers we work with and the supply chains are drawn mainly from construction, property maintenance and office supplies, as well as the employment of services from contractors, consultants and partner agencies. We do not currently have any supply chains outside of the United Kingdom.

3. Responsibility

The MSV Board has overall responsibility for approving this policy and ensuring it complies with our legal and ethical obligations, and that everyone complies with it.

The Chief Executive has primary responsibility for implementing the policy, monitoring its use and effectiveness.

The EDFBE is responsible for overseeing the implementation of this policy in the procurement policy and procedures. All managers involved in procurement are responsible for ensuring that suppliers meet the legal and policy requirements.

The Head of People and Culture is responsible for ensuring we comply with legislation in recruitment and that all our staff are appropriately trained.

The EDN&W is responsible for overseeing the implementation of this policy in safeguarding and lettings policies and procedures.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given appropriate and regular awareness training regarding the risk of slavery and human trafficking.

4. Policy & Procedures

We have a range of policy, procedures and processes that help to minimise the risk of slavery and human trafficking. The key ones are:

- **Procurement**
Our procurement policy and procedures provide that anyone responsible for purchasing works, goods or services from suppliers is expected to observe the highest standards of probity and fairness and work in a manner which ensures full accountability, consistent with MSV's values. We are committed to acting ethically, and with integrity and

transparency, and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our supply chain.

We have in place a supply chain compliance programme which is designed to:

- Identify and assess the potential risk areas in our supply chains; and
- Check that all of MSV's suppliers are aware of and comply with the Modern Slavery Act 2015 and are transparent, accountable, auditable and free from ethical ambiguities.

We maintain a list of approved and preferred suppliers. All suppliers will be required to:

- Comply with the modern slavery Act 2015
- Implement controls to detect and prevent Modern Slavery
- Notify MSV immediately upon becoming aware of any Modern Slavery within their suppliers

MSV's new supplier selection include due diligence processes that include compliance with the Modern Slavery Act as a condition of acceptance and our contract monitoring requirements include checks on third party compliance with the MSA 2015.

We expect all delivery partners, organisations within our frameworks and other companies we engage with us to ensure that their goods, materials and labour-related supply chains are free from any form of modern slavery. Our supplier selection procedures, conditions of tender and framework supply agreements include appropriate contractual provisions to ensure that our suppliers are contractually committed to seeking to avoid the use of slave labour and trafficked labour.

- **Risk**
Risk assessments are undertaken regularly both on an operational and strategic level. In light of analysis conducted to date we consider that MSV is at relatively low risk of slavery and human trafficking in terms of our own business and our supply chains.
- **Safeguarding**
MSV house a substantial number of vulnerable people both within our specialist supported housing stock and within our general needs stock. Our safeguarding policy is currently under review and the revised policy will include a section on our approach to dealing with modern slavery.
- **Lettings**
At the letting stage we undertake status checks to confirm that a person is eligible to rent a property from us. We require that all potential tenants provide us with proof of identity, National Insurance number, address and income prior to signing up for a property.
- **People**
Our recruitment policy sets out the checks we undertake as part of our recruitment process (including eligibility to work in the UK and the Disclosure and Barring Service (DBS)).

Our code of conduct policy lays down expectations for all employees and board members to follow. We strive to maintain the highest standards of employee/board conduct and ethical behaviour in everything we do.

In our Whistleblowing/Public Interest Disclosure policy we encourage employees or others with serious concerns about any aspect of our work to come forward and express those concerns. This includes risk of slavery or human trafficking.

5. What MSV has already actioned

- Temporary Agency Workers – we only use reputable employment agencies to source temporary staff and we verify the practices of any new agency we intend to use.
- We require new employees to produce original documentary evidence of their right to work in the UK prior to commencement of employment.
- We recognise Unite Trade Union and support their involvement in respect of employee rights.

- We carry out risk assessments at the start of a tenancy to identify if there is any cause for concerns about the tenants or their ability to sustain a tenancy.
- We conduct tenancy and estate audits.
- We train and support staff in discharging the Group's safeguarding duty, which includes modern day slavery.
- We limit the geographical scope our operations to ensure optimum supervision of our properties.
- Where possible, we build long standing relations and partnerships with suppliers, contractors, consultants and customers and make clear our expectations and values.
- Reviewed and developed a robust Recruitment & Selection policy.

6. What MSV will action

We will seek to:

- Implement a new procurement policy.
- Review contracts, in particular management agent contracts and service level agreements to ensure compliance.

- Review our Whistleblowing/Public Disclosure policy and Code of Conduct charter.
- Continue to take advice from the Group's auditors and legal advisors where appropriate.
- Offer on-going training as required.

7. **Related Policies**

Procurement, Risk, Lettings, Safeguarding, Recruitment, Whistleblowing/Disclosure of Public Interest, Code of Conduct.

8. **Monitoring, Review and Evaluation**

This policy will be reviewed annually to ensure its effectiveness.

This statement is made pursuant to section 51(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year beginning 1st April 2018.

Approved by the Board on 18th March 2018