

Policy title	Modern Slavery & Human Trafficking Policy
Summary	This Policy sets out MSV Housing's commitment to recognising and preventing modern slavery and human trafficking in all its business activities and within its supply chains.
Scope	The policy applies to all MSV's business activities and supply chains.
Author & Job Role	Sian Leighton, Assistant Director - Strategy & Engagement
Business Area	Chief Executive's Team
Document Status	Approved
Document Reference	Chief Exec Area/Strategy & Engagement/1.3
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Consultation	Senior Leadership Team, EDI WP

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1. Introduction & Policy Purpose

As a responsible employer, social landlord and business MSV Housing is committed to doing everything it can to prevent modern slavery and human trafficking. This policy sets out how we deliver that commitment, understanding and mitigating risks of modern slavery or human trafficking taking place within our business or supply chain, and demonstrating compliance with the Modern Slavery Act 2015.

The purpose of this policy is to outline MSV's ongoing commitment to addressing and mitigating modern slavery and human trafficking risks across its business operations and supply chains.

2. Scope

The policy applies to all MSV's business activities and supply chains.

3. Definitions

Moderns Slavery is the act by which an individual is being exploited or controlled by another individual or group, without the ability to leave.

An individual is considered in slavery if they are forced to work; through coercion, mental or physical threat, trapped or controlled by an 'employer' through mental or physical abuse, or the threat of abuse, dehumanized and treated as a 'commodity', physically constrained or have restrictions placed on their freedom of movement.

Human Trafficking is the unlawful act of transporting or coercing people in order to benefit from their work or service, typically in the form of forced labour or sexual exploitation.

4. Roles and Responsibilities

4.1. MSV Board is responsible for:

- Approving this policy on an annual basis.

4.2. The Senior Leadership Team (SLT) has overall responsibility for this policy. The following Assistant Directors have specific responsibilities which include:

- Strategy & Engagement – implementation, oversight and monitoring of the policy.
- Assets - procurement
- Independent Living - safeguarding
- Customers - lettings
- People & Talent - recruitment and training.
- Finance – supplier processing.

4.3. Leaders are responsible for:

- The day to day implementation of this policy and ensuring their teams are aware of their responsibilities in making our activities against modern slavery and human trafficking effective.
- Ensuring they comply with the requirements set out in the supplier process and procurement policy and associated procedures.
- Ensuring arrangements for dissemination and training for staff where necessary

4.4. All employees are responsible for:

- Ensuring they are aware of this policy and undertake appropriate training.
- Preventing, detecting and immediate reporting of any instances or concerns of modern slavery and human trafficking.

5. Monitoring, Review & Evaluation

The effectiveness of this policy will be monitored by the Assistant Director - Strategy & Engagement via:

- Quarterly checks to ensure compliance with the policy.
- Annual reporting to Board.

6. Related Documents

Key strategy/policy documents are listed in the Policy Statement.

7. Version History

Version	Date	Description/Summary	Status	Author
V1.0			Final	HSE
V1.2	03/24	Redraft	Draft	HSE
1.3	01/05	Approved by Board	Final	HSE

8. Modern Slavery & Human Trafficking Statement 2024

Introduction

This statement is made in compliance with section 54(1) of the Modern Slavery Act 2015 and constitutes MSV's Anti Modern Slavery and Human Trafficking Statement for the financial year ending 31 March 2024.

The Modern Slavery Act 2015 requires organisations supplying goods or services with a turnover of above £36million to prepare and publish an annual Modern Slavery statement.

This statement sets out the steps MSV Housing has taken to ensure modern slavery or human trafficking is not taking place in its organization activities or supply chain.

Organisational structure

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

MSV Housing is a registered charitable social housing provider with approximately 9000 homes and for the year ended 31 March 2023 we achieved a turnover of over £53 million. We employ approximately 380 people.

MSV's business is primarily centred on the following services:

- Housing and tenancy management services covering varied tenure types
- Letting of properties
- Repair and maintenance of properties
- Rent collection
- Tenancy sustainment support
- Training and employment support
- Supporting vulnerable client groups
- Development of new homes.

MSV was formed in 2017 as a result of the merger of two housing associations. MSV is the Group parent and owns the majority of the social housing assets of the Group.

MSV Invest Ltd (MSVI) was formed to hold the Group's commercial housing asset portfolio. It is the investing body in the GMJV FundCo LLP on behalf of the Group.

GMJV FundCo LLP (FundCO) is an equal joint venture with nine other Registered Providers who, along with the Greater Manchester Combined Authority, created Hive Homes (Greater Manchester) LLP, the aim of which is to undertake property development for market sales. MSVI does not control FundCo.

There are no inactive entities within the MSV Group.

Assessing and managing risk

MSV actively manages risk both at a strategic and operational level, in line with its Risk Management Policy. To date there are no areas of its activities that are considered to be a high risk of modern slavery or human trafficking.

Policy Framework

MSV has a comprehensive Policy Framework where strategies, policies and associated procedures are reviewed regularly to ensure we continue to comply with our regulatory and statutory obligations. Key strategies/policies which contribute to minimizing the risk of modern slavery and human trafficking, include:

- Procurement
- Financial Regulations & Delegations
- Safeguarding Policy
- Whistleblowing
- Anti Fraud and Money Laundering
- Anti-Bribery and Corruption
- Probity
- Code of Conduct
- Equality, Diversity & Inclusion
- Recruitment & Selection
- Lettings
- Risk Management
- Antisocial Behaviour
- Hate Crime
- Domestic Abuse

Due Diligence Processes for Modern Slavery and Human Trafficking

Due diligence in key areas of our activities is well developed as set out below:

1. Recruitment

- Pre-employment checks, such as eligibility to work in the UK and Disclosure Barring Service (DBS) checks are conducted as appropriate for the role.
- Temporary Agency Workers – we only use reputable employment agencies to source temporary agency staff and undertake the necessary checks. We also verify the practices of any new agencies we intend to us.

2. 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 have implemented structured supplier checks using questionnaires and checklists
- All suppliers on the MSV suppliers list are required to comply with the Act, implement controls to detect and prevent modern slavery and notify MSV immediately upon becoming aware of any modern slavery within their supplies.

3. Safeguarding

- Our safeguarding policy has recently been reviewed and associated procedures implemented.
- Safeguarding training is a mandatory requirement for a majority of roles.

4. Lettings

- We conduct pre-tenancy checks with applicants for our properties including confirmation of:
 - Proof of identity
 - Right of residence
 - Work/economic status
 - Tenancy reference checks

5. Tenancy Checks

- Once properties are let, tenancy and estate audits are carried out on a regular basis, to include checks to ensure properties are not occupied for illegal purposes, including modern slavery.

Reporting concerns

Any colleague, contractor, supplier acting on MSV's behalf must raise any concerns or suspicions of incidents of modern slavery and/or human trafficking with their line manager, the Assistant Director – Strategy & Engagement or a Safeguarding Champion (see Safeguarding Policy).

In the event of a serious concern colleagues/suppliers may also contact:

- The Modern Slavery Helpline on 0800 121700 or via www.modernslaveryhelpline.org
- The Police on 101 or 999 if an emergency.
- Crimestoppers on 0800 555111

Our ongoing commitment to the Modern Slavery Act

- Implement our new agreed procurement policy and associated procedures which will tighten our controls in this area.
- Continue to work with our repairs, asset management, compliance and development teams in particular to ensure we have appropriate assurance that modern slavery risks are being appropriately addressed in their supply chains.
- Rollout Modern Slavery awareness training via our online learning platform.
- Continue to regularly review policies which link with Modern Slavery Act 2015.

- Continue to take advice from the Group's auditors and legal advisers where appropriate.

Declaration

We are not aware of any modern slavery or human trafficking incidents that have occurred within MSV or our supply chain but will continue to act vigilantly and in line with the Modern Slavery Act during the 2024/25 financial year.

This policy and statement have been approved by Board on 1st May 2024

EQUALITY IMPACT ASSESSMENT (EIA) Pro-forma

Name of Policy	Modern Slavery	
Date of Assessment	14/02/2024	
Name & Role of Assessors	Sian Leighton	
What are the desired outcomes of the policy?	To ensure any modern slavery and human trafficking concerns are picked up through this policy and related practices	
Who are the main stakeholders in relation to the function?	Colleagues, Board/Committee Members, Suppliers, Contractors, Service Users	
Who will be consulted and what types of consultation will be carried out?	SLT & EDI WP	
Summarise any evidence considered	This is designed to protect vulnerable people covered by the Modern Slavery Act 2015	
Could the function have a differential impact on:	Yes / No	What evidence exists to support your analysis?
	Yes / No	
Race Consider language and cultural factors	No	
Gender reassignment Consider people proposing to or have undergone a process of having their sex reassigned.	No	
Disability Consider physical, visual, aural impairment, mental, learning difficulties	No	
Age Consider Elderly or young people	No	
Sexuality Either know or perceived	No	

Gender	No	
Religion or belief Consider religious or cultural observance including non-belief, practices of worship	No	
Other protected or vulnerable characteristics: <ul style="list-style-type: none"> • marriage or civil partnerships • pregnancy or maternity? 	No	
<p>If the answer is NO to <u>all</u> questions and no differential treatment has been found there is no requirement for a full Equality Impact Assessment. Please go back regularly and review the cycle.</p> <p>If the answer is YES to any of the questions, please complete the rest of the form.</p>		
In what areas could the differential identified be considered to have an adverse impact in this function and what solutions will be introduced to overcome these adverse impacts?		
In what areas could the differential identified be considered a positive impact in this function and what strategies will be introduced to safeguard and spread these positive impacts?		
Which Action Plans have these solutions/strategies been transferred into?		
Who will be responsible for monitoring these Action Plans?		