

Platform Housing Group Modern Slavery Statement

Summary

This statement confirms Platform Housing Group's (PHG) commitment to recognising and mitigating risks of modern slavery in its business activities and within its supply chains. The following statement will outline the measures we have implemented to ensure compliance with the Modern Slavery Act (MSA) 2015, highlighting our commitment to ethical business practice.

As a business we continually review and update our policies and practices to ensure that we have the most effective responses to modern slavery risk, preventing any damage to human rights.

The following statement sets out:

- Our business structure
- Our risk assessment
- Due diligence processes
- Recruitment and procurement policies
- Training on modern slavery
- How we measure effectiveness

As a large organisation, PHG recognises its responsibility to act ethically and mitigate the risks of modern slavery in our own practices and in our supply chains, aligning these practices with our core business ethics.

1. Business Structure

Platform Housing Group is one of the largest housing associations in the Midlands, with around 1,850 staff, over 125,000 customers and over 48,500 homes from Herefordshire in the West to the Lincolnshire coast in the East, and from the Derbyshire Dales in the North to the Cotswolds in the South. Platform Housing Group has a commitment to make a real and positive difference to the lives of local customers and the communities they live in.

At the core of Platform lies our mission to build a better future by investing in affordable homes, services and communities. We recognise the importance of access to a safe, secure and affordable home in a community in which our customers feel most comfortable in, and we invest our surpluses into developing more affordable homes to enable communities we work with to thrive.

As an organisation, we put the wellbeing of our customers and colleagues at centre of what we do. Therefore, we have put the following measures in place to ensure we respond effectively to modern slavery risk that may arise.

2. Risk-assessment



Platform conducts thorough risk assessments and we have identified areas within the business where the highest risk of modern slavery exists, including Procurement, Contracting, HR, and customer facing roles, such as our Property Care team.

Sectors within our supply chains that face the highest risk are the electronics, cleaning and construction industries.

Furthermore, some of the most vulnerable groups in the UK include migrant workers, asylum seekers and persons with learning disabilities. Awareness of these vulnerable groups and sectors will allow us to employ modern slavery due diligence throughout our internal business practices and our wider supply chains.

3. Due Diligence Processes

It is important to us that we employ ethical business practices that are aligned with our mission and core values. Procurement and recruitment are two of the key areas of the business which hold large responsibility for mitigating modern slavery risk, and below we have outlined some of our policies and procedures for mitigating risk in these departments.

4. Our Policies

Recruitment

As an employer, we are committed to paying the National Living Wage and we regularly review our terms of employment to ensure that they comply with all relevant legislation. During the recruitment process, we conduct thorough checks to ensure that our colleagues have the relevant documentation and have the right to work in the U.K.

The Group strives to treat every individual with dignity through robust HR policies. Our strategy is undertaken in accordance with group Equality and Diversity Strategy and codes of conduct, and we act sustainability in accordance with the Group's Environmental Policy.

Procurement and Supply Chains

Our Procurement Team are dedicated to acting ethically, engaging with the issue of modern slavery from the very outset of procurement. Through a risk-based approach, the procurement team act with integrity in all its business relationships. We work to identify high risk activities from the outset, implementing systems and controls that seek to ensure slavery and human trafficking is not happening anywhere within our supply chains.

We consider the entire supply chain when it comes to ethics, not just our own. Our tender award criteria requires new suppliers to declare that they themselves, and their supply chain, are not involved in modern slavery and have not been subject to any investigation in connection with an offence involving human slavery or trafficking. We continue to add provisions in our template contract documentation, requiring our suppliers to provide evidence of actions they are taking to ensure there is no human slavery in their supply chains. Any evidence of non-compliance to the MSA is investigated and remedial action is taken. Platform Housing Group maintains a zero-tolerance approach to modern slavery, and we will not tolerate this in our supply chains.

Furthermore, we recognise the role of good supplier relationships in maximising social value and ensuring compliance with the MSA. Therefore, we are committed to improving our supplier management area, working with our suppliers to encourage openness and transparency so that potential risks can be identified early on and acted upon, minimising harm. Our Service Level Agreements set out how buyers and suppliers should behave in respect of



identifying and acting on any suspected instances of modern slavery, continuous monitoring and contract management will ensure that our suppliers are demonstrating good, ethical practice.

Platform strives to create a work environment where all colleagues feel safe, respected, and secure. Therefore, we have established a Whistleblowing Policy to ensure that anyone who reports a concern, are fully protected. We also have a Safeguarding Policy, procedure, and reporting system in place so that colleagues can identify and report issues efficiently and effectively. Through our safeguarding training module, colleagues are taught about the types of issues that may arise and how to identify them, and then how to report these issues through our Safeguarding Concern Form. This training ensures that colleagues are confident in their ability to report safeguarding concerns and gives them reassurance that these concerns will be dealt with effectively.

5. Our Training

At Platform, we value the role of education in ensuring that robust modern slavery due diligence is integrated into our business practice. The Group is committed to continuously improving our training on modern slavery, and we ensure that all of our relevant employees are trained on risks, policies and standards related to modern slavery, human trafficking and forced labour.

Previously, Platform has hosted face-to-face talks with representatives from Hope for Justice, a charity which endeavours to end human trafficking and modern slavery. These representatives provided us with insight from their first-hand experience of supporting and rescuing victims of modern slavery, and Platform hopes to work again with the organisation for further informative discussions. Furthermore, we have a modern slavery training module available to us from our training provider, HQN, and we are utilising this course to ensure that all our colleagues are fully trained on modern slavery in the context of housing.

Alongside this, our digital learning team are committed to developing modern slavery learning resources, looking at how we can tailor training in an effective way for different work groups. For example, our front-line colleagues, such as our Property Care team, run a higher risk of coming across modern slavery their day-to-day activities and it is vital these workers are trained on the key warning signals. Therefore, we are currently seeking ways in which we can make training courses more readily available on our training portal, the Academy, finding ways to go above and beyond to mitigate risks of modern slavery. Alongside this, we will continue to use our intranet page, Platform Together, to discuss these issues so that our colleagues have a full understanding of risks and policies, and how this affects their line of work.

6. Measuring Effectiveness

Through effective monitoring, Platform will be able to ensure that targets are met, and robust modern slavery due diligence is a business as usual activity. Where room for improvement is identified, appropriate action is taken to rectify gaps in our policy and practices.

We will look into incorporating a short test at the end of our online training module to ensure that colleagues understand the implications of modern slavery, its policies and standards. This will allow us to evaluate awareness across the Group whilst giving us an indication of where training needs to be improved. procurement, our team is committed to building robust supplier relationships and through effective supplier management, we ensure that our supply chains are completely ethical and sustainable. Key Performance Indicator's (KPIs) are set for each contract, and supplier performance is measured against these KPIs to ensure effectiveness and highlight the need to intervene where appropriate.



This statement is made under section 54(1) of the Modern Slavery Act 2015. It constitutes our Group's slavery and human trafficking statement for 2021. The turnover of the Group exceeds £36 million for that period.

This statement is approved by Platform Housing Group Executive Team on behalf of the Platform Housing Group Board and applies to all organisations within the Group. It will continue to be reviewed and updated as necessary or, as a minimum, on an annual basis.

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