Modern Slavery Statement

Who we are

We are community focused; a charitable housing provider with a social purpose and a registered subsidiary (Heart of Medway Housing Association). Owning and managing over 10,000 homes across the group, we are Kent's largest independent landlord, and our customers are at the heart of everything we do. We change lives and make a difference because we believe everyone needs a safe, secure, affordable home as a steppingstone towards a better future. Our ultimate goal is to help end the housing crisis in North Kent, and so, in 2023/24 we:

- Built 94 new homes
- Provided a home for over ***435*** households (of which 83 moved into supported accommodation) – this doesn't include market rent which would increase the number to ***498***
- Let 28% of our homes to people that were previously homeless

Statement of Intent

Modern slavery can be defined as various forms of exploitation where individuals are forced, coerced, or deceived into labour or services, often through threats or abuse, with little or no freedom to leave. It encompasses practices such as forced labour, human trafficking, debt bondage, and servitude, and can occur in many different industries.

1. mhs are committed to acting ethically and with integrity in all business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure we remain fully compliant with the Modern Slavery Act 2015.

2. mhs are committed to upholding human rights and to taking steps to ensure that modern slavery and human trafficking are not taking place in any part of our business or supply chains and have a zero-tolerance approach to modern slavery and human trafficking in all its forms. We are committed to ensuring the safety and well-being of our residents, employees, and all individuals involved in our operations and in providing enhanced support and protection for victims.

3. Our Modern Slavery Statement applies to all companies within the mhs homes group. We are committed to renewing our modern slavery statement annually and reviewing any measurables that are outlined in the statement.

4. Being compliant with the Modern Slavery Act 2015 gives law enforcement the tools to fight modern slavery, and to ensure perpetrators receive suitably severe punishments for these appalling crimes.

Procurement

We have a dedicated procurement team who adhere to all relevant procurement policy and legislation. As a result, we can fully consider quality, price and purpose prior to making buying decisions. We have contract managers in place for every supplier we use, which enables us to always

achieve and maintain the highest standards possible. We only use specified, reputable employment agencies to source labour.

This statement extends to all our suppliers as well as their subcontractors and we expect the same high standards from all. We also expect our suppliers to hold their own suppliers to the same high standards.

We follow the most up to date Procurement Directives as good practice as well as to ensure that any safeguarding incidents raised by our suppliers are acted on as necessary. We arrange for our supply chain to be regularly audited, and work with our suppliers to identify areas where slavery or human trafficking may be a risk.

All our contractors and suppliers are UK based, and we are committed to using small / local firms wherever possible, allowing us to develop close working relationships. This also links into our commitment to Social Value and Responsibility, Living Wage, Sustainable Procurement, a priority on supporting the local economy, and in working collaboratively with our suppliers (and their suppliers) to phase out, and, ultimately, put a stop to all forms of slavery and human trafficking.

We carry out an annual contractor health check to clarify and confirm that suppliers are compliant and meet the following requirements:

All employees

1. Are legally able to work.
2. Have freely chosen employment (no forced or bonded labour)
3. Have a written contract.
4. Have not had to pay fees or lodge documents to obtain work.
5. Understand their statutory rights (i.e. sick pay and holiday pay).
6. Are paid in accordance with national law.
7. Are working in a safe and hygienic environment.
8. Are not expected to work excessively long hours and that working hours comply with national laws and guidelines.
9. Assess quotations and fees from any agency or supplier providing unusually low rates when compared with industry standards.

The percentage of compliant suppliers is reported to mhs homes Group Board annually.

Our Residents & Properties

We understand that our customer base is representative of a diverse set of backgrounds and needs, and that isolated customers or individuals with vulnerabilities may be especially at risk. We will, therefore, carry out all processes to help us identify any at risk or vulnerable residents or groups in our properties.

We aim to carry out 2,500 homes plan visits, (including ID checks) on an annual basis, and ensure that there are appropriate processes are in place to make sure that homes are allocated appropriately. We will also ensure that all our front-line staff who visit customers' homes have completed the appropriate safeguarding training and understand fully how to raise/report any safeguarding concerns they may have. We will ensure that we utilize our partnerships with external organisations to share intelligence, which will better our ability to identify where Modern Slavery could potentially be taking place.

We recognise that the use of our homes to facilitate Modern Slavery is a risk, and so, any suspected cases of tenancy fraud will be reported to our Finance, Risk and Audit committee quarterly. Likewise, any tenancy found to have been granted on a fraudulent application will be terminated through the appropriate mechanisms.

As part of the annual report to Group Board we will confirm how many tenancy audits have been completed against the target and by exception how many safeguarding issues were raised.

Our Staff

We pride ourselves on being an employer of choice. We've been recognised as an Investor in People, with Gold accreditation since 2012. In 2021 we achieved Silver Accreditation to the We Invest in Wellbeing framework. Our Leadership Behaviour Framework is just one way that we seek to encourage and empower staff across all levels to solve problems. We believe that everyone has a crucial part to play in tackling Modern Slavery and Human Trafficking, and we will continue to do all we can to raise awareness so that staff are able to understand, identify and report on any potential risks.

We ensure that all relevant processes to ensure compliance with UK employment law are drawn upon at all times. This includes a commitment towards meeting salaries in accordance with the Living Wage Foundation, and the National Living Wage for apprentices.

All our staff-based policies and procedures comply with UK employment law and work to mitigate the risks posed by Modern Slavery and Human Trafficking as follows:

- All new employees go through robust vetting procedures and ID confirmation
- Any temporary staff are sourced through reputable agencies and under the supervision of the HR and procurement teams
- All staff must complete mandatory training in the form of e-learning, and we monitor and report on the total percentage of staff who do so
- The correct posts are in place for us to ensure the effective management of the risks associated with Modern Slavery – namely, Procurement Manager, HR Manager, Lead Learning & Development Practitioner and Finance Director

Sharing this Statement

We produce an annual report on all measurables to show compliance with this statement. This report is provided to all Boards along with any tenancy fraud cases via the Fraud and Whistleblowing Report to our Finance, Risk and Audit Committee. The statement is affirmed at all Boards annually. We also share this statement with our staff and regularly promote our whistleblowing procedure to ensure that staff are aware of how to raise any concerns.

Although we perceive the risks within our business to be small, we seek to constantly measure our performance in the fight against Modern Slavery and Human Trafficking, so we can see where we're on

track and where we need to improve. For instance, we regularly review our existing policies to make sure that they demonstrate best practice and to mitigate against potential risks.

Future Steps

We will ensure that there are ongoing training opportunities so that all staff recognise the importance of The Modern Slavery Act 2015, and where this sits in comparison to other relevant policies within the field, such as whistleblowing and recruitment, so that we remain fully compliant at all times.

References:

(1) https://www.gov.uk/government/publications/modern-slavery-and-public-health/modern-slavery-and-public-health

(2) https://www.gov.uk/government/collections/modern-slavery-bill