

Modern Slavery and Human Trafficking Statement

For the Financial Year ending 31 March 2024

Introduction

Chelmer Housing Partnership Ltd (CHP) fully supports the principle aims of the Modern Slavery Act 2015 (the Act) and is committed to combatting slavery and human trafficking in all aspects of our work.

In this statement we outline the steps we've taken to target Modern Slavery for the financial year ending 31 March 2024, which covers the period 1 April 2023 to 31 March 2024. We'll continue to examine the effectiveness of our approach to ensure continuous improvement. We'll update this statement every year and publish this on our website.

CHP's structure and business

We are an exempt charity, and Registered Provider of Social Housing (registered in England). We're principally involved in the development and management of affordable housing.

The CHP Group consists of one registered provider (Chelmer Housing Partnership Ltd) and three active companies (Myriad Homes Ltd, Myriad Housing Ltd and Myriad Capital Plc). Chelmer Housing Partnership Ltd is the parent company of the Group and a charitable registered provider regulated by the Regulator of Social Housing.

Our mission is to transform lives by creating great homes and communities for everyone. We reinvest our financial surpluses to provide good-quality housing and landlord services. We own and manage over 11,000 homes and employ over 360 employees. Our principal activities are the provision of social and affordable rented homes for people who cannot afford to rent or buy in the open market, housing management services, low-cost home ownership (primarily shared ownership) and the management of leasehold properties.

Supply chain management

Our supply chains include goods and services for the construction, repair and maintenance of residential homes. We also purchase goods and services to facilitate running our office premises.

We don't condone any activity which constitutes modern slavery or human trafficking under the Modern Slavery Act. We expect our suppliers (and our supply chain) to maintain the same approach and to have policies and procedures in place to minimise the risk of modern slavery or human trafficking occurring.

We have a Procurement Policy, which includes modern slavery. We're committed to the effective management of our third-party expenditure and supplier arrangements. To reflect our commitment, we have a dedicated Procurement Team. We require our supply chain to sign a modern slavery declaration before they can start to work with us, provided services or deliver goods to us. We ask our supply chain to sign a declaration on an annual basis once appointed.

As we're based in and operate solely within the UK, we've identified that our overall exposure to the risk of slavery and human trafficking is low. However, within our business, we pay particular attention to construction contracts and the use of sub-contracted labour.

Employees

We monitor rates of pay and the calculation of legal deductions. We're accredited as a Real Living wage employer and pay at least the Real Living Wage. We provide all employees with core organisational benefits. We make salary payments directly to employees and never delay, defer or withhold payments unless there's prior agreement or notification.

We'll only recruit temporary staff from specified, reputable employment agencies. We prohibit child labour and the use of worker-paid recruitment fees. We'll never confiscate employees' original identification documents, and everyone has the freedom to end their employment. We encourage employees not to work more than the number of hours permitted by law and don't require any compulsory overtime.

We support the freedom of association. This is the right to of a person to associate with any group they wish, including joining or leaving the group, and for the group to take collective action on behalf of its individual members. An example is joining trade unions.

Our free, comprehensive 24-hour Employee Assistance Programme offers guidance and counselling relating to both work activities and personal lives of our colleagues.

We expect these principles to apply to employment of people within our supply chain as well as our own operations.

Our policies

We don't have a specific policy regarding modern slavery but consider modern slavery as part of the overarching statement that feeds into all elements of our Policy and Strategy Framework. Our policies and procedures help identify cases of modern slavery and human trafficking in our supply-chain, our business and our communities.

As a housing provider, we have policies and processes in place that assess and monitor the people who we house. We ensure, through the management of our buildings, homes and neighbourhoods, that our properties are not used for the purposes of trafficking or allowing modern slavery to take place.

If we have concerns, we address these in line with our wider safeguarding approach, as detailed in our Protecting People from Harm (Safeguarding) Policy.

This year we've published our new Diversity, Equity and Inclusion Policy, setting out our commitment to go beyond our duties under the Equality Act 2010, tackling inequality in its widest sense and challenging discrimination based on a variety of social and cultural characteristics.

In addition, our Respect at Work Policy commits us to the fair treatment of all, free from prejudice and discrimination. We expect everyone to conduct themselves in a professional, respectful and courteous manner, and to expect the same in return.

Risk assessment

We have a Risk Management Framework in place, which defines CHP's methodology for identifying potential risks relevant to us and to define the strategy for dealing with them. Through this framework we identify risks relating to modern slavery and ensure that these are assessed, monitored, managed and reported accordingly.

Due diligence

We conduct due diligence on the companies we work with. All existing suppliers of products, goods and services have been asked to confirm that they, and any sub-contractor they employ, comply with the Act. All new partners will be required to confirm that they comply with the Act as part of their contract with us. We ask suppliers to confirm again on an annual basis.

We have robust recruitment processes, which includes verification of a person's identity and their right to work in the UK before they start work with us.

We'll continue to monitor supplier compliance with the Act and to take appropriate action if they aren't found to be compliant.

Training

Our employees have modern slavery training available as part of our E-learning. Through this, employees are advised what they should do in the event they become aware of any indication that:

- an employee of a provider of products goods or services to us appears to be the subject of slavery;
- a customer may be involved in assisting some form of slavery, for example, by allowing or facilitating multi-occupation of their home (fully or partially).

We continually seek ways to raise employee awareness of the risks of modern slavery and human trafficking, including through refresher training.

Employees are required to report any suspicion of a breach of the Act in line with our Whistleblowing (Confidential Reporting) Policy. This policy ensures full protection to anyone reporting a concern. This policy is available on our intranet, website and through the procurement process. We support anyone working for us directly, or indirectly through a supplier, who raises any concerns about actual or suspected criminal offences, including modern slavery or human trafficking.

Goals and key performance indicators

We've have established a set of metrics to measure the effectiveness of our actions to evidence compliance with the Modern Slavery Act 2015 and to report continuous improvement and progress over time.

Non-compliance

If we identify modern slavery practices in either the provision of an CHP supplier contract or the CHP business, we will:

- notify the appropriate law enforcement agency/ies;
- work openly and proactively with key stakeholders to resolve issues and change working practices;
- support people who are impacted, including considerations in line with our Compensation and Goodwill Gesture Policy;
- consider terminating the contract (if applicable).

This Statement is made under section 54(1) of the Modern Slavery Act 2015. It was approved by CHP's Board on 25 September 2024 and applies to all companies within the CHP Group.

Signed

Paul Edwards
Chief Executive

Date: 25 September 2024