

Modern Slavery Act Statement 2024

Organisational structure & supply chains

Housing Solutions is a housing association operating predominantly within the Berkshire and Buckinghamshire area. We are a leading provider of affordable homes, for rent, sheltered, care and support, leasehold and shared ownership. We own, maintain and manage 6,411 homes, employ 180 people and have an annual turnover in excess of £55m (31 March 2024).

Housing Solutions is regulated by the Regulator of Social Housing (RSH). We are a community-based landlord with a strong sense of social purpose. We work with multiple specialist agencies to support vulnerable residents. Our corporate mission is to keep residents safe at home and our people safe at work.

We are committed to acting ethically and with transparency in all areas of our business and activity. We have zero tolerance of modern slavery and human trafficking in any part of our business and supply chains. We have a number of supply chains across our business to help build, manage and maintain our homes with risks in specific areas (such as construction and maintenance). We require our suppliers and contractors to comply with the Act in order to work with us.

This statement is made in accordance with the Modern Slavery Act 2015 (the Act) for the financial year ending 2024 and sets out the steps the Housing Solutions group has taken, continues to take, and has committed to take to ensure that that modern slavery and human trafficking is not taking place within any part of our business or supply chain.

Employment & Training

We treat all colleagues fairly and equally.

- Our transparent and robust recruitment processes include verifying eligibility and rights to work in the UK for all employees to safeguard against human trafficking or individuals being forced to work against their will
- Our recruitment policy ensures that we source employees from reputable employment agencies
- We pay at least the Living Wage and provide all employees with core organisational benefits
- Employees are encouraged not to work in excess of the number of hours permitted by law
- We make salary payments directly to employees and do not delay, defer or withhold payments unless there is prior agreement or notification

- Our free to access, comprehensive Employee Assistance Programme offers guidance and counselling relating to both the work activities and personal lives of our employees

Our HR team receives appropriate training to enable them to conduct checks on documents, such as passports and other forms of identification, to avoid being party to trafficking.

We have a comprehensive programme of compliance training for employees, all of whom have received training advising of the requirements of the Modern Slavery Act. We updated and refreshed our mandatory staff training on modern slavery in 2024 to reflect the increasing incidence of modern slavery and human trafficking in recent years. We also provided additional role-based training for all senior managers. All staff training in this area covers : the different types of slavery, potential indicators, groups at particularly high risk, online and telephone reporting and referral processes for victims. <https://www.gov.uk/government/collections/modern-slavery>

Our Safeguarding and Professional Boundaries training programme for all employees also includes elements on how to identify and report potential safeguarding concerns relating to modern slavery or human trafficking. Our safeguarding training was enhanced over 2023/24 with a greater focus on modern slavery including potential indicators.

Our Modern Day Slavery, Safeguarding and Professional Boundaries training courses are integrated within our core induction for new employees in addition to regular refresher training for all employees.

Procurement

Our suppliers are required to comply with relevant legislation and regulation, to follow our policies, and to understand the needs of the vulnerable people we work with. We have:

- Specific requirements for suppliers tendering for contracts to confirm compliance and to provide us with evidence of this
- A centralised and maintained contracts register containing all Housing Solutions' contracts, which allows us to review and amend terms with suppliers so that they deliver against our requirements
- A formal set of terms and conditions that all suppliers agree to comply with
- Continued to review our procurement policy and procedures and our terms with suppliers so that they deliver against our requirements
- Configured our supplier on-boarding process to ensure that prospective suppliers are aware of the Act and agree to adhere to it

Relevant policies and procedures

Housing Solutions operates the following framework and policies which describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its business practices, or those of our contractors and suppliers:

- **Whistleblowing Policy** – we encourage all colleagues to report any concerns relating to Housing Solutions or its supply chains and have processes in place to enable this. The Whistleblowing Policy is designed to make it easy for colleagues to make disclosures, without fear of repercussions. Our policy was strengthened in March 2023 so as to enable external contractors to raise concerns about any aspects of our business activity.
- **Anti-Fraud, Theft & Bribery Policy** – we will take steps to ensure that no incidents of malpractice or unlawful activity take place in our business and workplace, adopting a zero tolerance to ensure any incidents are dealt with formally.
- **Procurement**– we are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.
- **Approved Contractor Standards** – all contractors and suppliers working on behalf of Housing Solutions must agree to our contractor standards requiring that they comply with the Modern Slavery Act 2015. These standards contain wider safeguards for our vulnerable residents
- **Recruitment policy** – we use only specified, reputable employment agencies to provide staffing and always verify the practices of any new agency we are using before accepting workers from that agency.
- **Safeguarding** – we report annually on safeguarding cases and outcomes to our Board and have developed policies which promote and safeguard the welfare of those living in our properties or receiving our services. We work closely with specialist agencies and will report any suspected incidence of slavery or trafficking without delay to the relevant authorities
- **Tenancy Audit** – we visit all our tenants on a rolling basis as part of our tenancy audit programme. During these visits we check for indicators of modern slavery and human trafficking, as well as any other welfare concerns which tenants or members of their household may have. Where we have concerns, we use the information gained through the tenancy audit in line with our wider safeguarding approach to take these forward.

Due Diligence

We will continue to take appropriate steps to ensure that there is no modern slavery or human trafficking in our supply chains. This includes continuing to review our existing policies and procedures in light of the requirements of the Act.

Reporting Concerns

We recognise the impact of the Covid-19 pandemic on increasing the number of people at risk of being trafficked and exploited. We will act upon reports of any modern slavery and/or human trafficking taking place within our business or supply chains as appropriate including any referral(s) needed to the relevant statutory agency.

Anyone with any concern about modern slavery or human trafficking should contact the Modern Slavery Helpline on 08000 121 700 or the police on 101.

Strengthening our approach to modern slavery

We have committed to taking further steps to reduce the risk of modern slavery and human trafficking within our supply chains and the work we do :-

- We will seek information from all contractors and suppliers working on behalf of Housing Solutions regarding their current sub-contracting and third party arrangements for the purpose of supply chain mapping and quality benchmarking against our standards;

We will publish our modern slavery statement on both our website and the government's 'modern slavery statement registry' to ensure our commitments are clear and transparent to the wider public.

Board approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by the Board of Housing Solutions and will be reviewed in line with the requirements of the Act.

Signed: 

Date of approval: 17 July 2024