

Modern Slavery

Modern Slavery Statement 2022

Introduction

The statement below is made pursuant to Section 54 of the Modern Slavery Act 2015 and explains the steps that The Nottingham City Homes Group have undertaken to ensure that there is no slavery or human trafficking within our organisation, our sub-contractors, partners, subsidiaries and supply chains.

Nottingham City Homes is committed to identifying and mitigating all potential modern slavery risks and will continue to take a robust approach and regular reviews of all relevant policies and practices when it comes to employees, tenants and customers.

NCH structure and business and supply chains

Nottingham City Homes is a group of housing companies that work together to deliver on the vision of creating homes and places where people want to live. The Group comprises Nottingham City Homes, NCH Registered Provider and NCH Enterprises Ltd.

Nottingham City Homes (NCH) is an Arm's Length Management Organisation that was established in 2005 to manage properties and provide housing and support services to Nottingham City Council tenants and leaseholders. We manage around 27,500 properties across the city of Nottingham making us the largest housing organisation in the city.

The organisation currently operates in the United Kingdom.

Nottingham City Homes procures a wide range of goods and services including and not limited to:

- property development
- repairs and maintenance
- communications and IT services
- agency staff
- various professional services.

At Nottingham City Homes Group, we recognise the responsibility that we share with our suppliers, to buy materials and deliver our services in an ethical manner. As part of this commitment, we acknowledge our responsibility towards the Modern Slavery Act 2015 and will ensure transparency within the organisation and with our suppliers of goods and services to NCH Group. The standards outlined are applicable across the whole of the NCH Group and all our subsidiaries.

We want our customers to be confident that our business partners treat their employees fairly, with respect for human rights and are not exposed to unsafe working conditions or in any way forced to work under slavery. We believe that when ethical standards are in place, this can improve worker well-being, productivity and quality, which benefits both our suppliers and our customers. Only suppliers who share our standards and values will be considered appropriate to trade with NCH Group and we seek to develop long-term trading relationships with suppliers based on the principle of fair, open and honest dealings at all times.

Due diligence processes in relation to slavery and human trafficking in business and supply chains

Our appraisal process will incorporate a review of the controls undertaken by our suppliers and now also requires, from all suppliers, an annual statement of their commitment and actions taken to eliminate modern slavery.

Imported products sourced from outside the UK or EU are potentially more at risk of slavery or human trafficking issues. If products have to be sourced from such locations, we look to work in partnership with companies who possess certifications which have independently assessed standards that reinforce their commitment to human rights, working conditions and the provision of a living wage.

Suppliers are risk assessed on a timely basis, taking account of market/environmental changes to establish what further information and/or due diligence may be required to provide assurance that slavery or human trafficking is not taking place within the business or supply chains.

Our formal procurement process requires all prospective suppliers to confirm whether they comply with the Act. Where their turnover is above £36 million, they are asked to provide their annual statement together with evidence of

compliance. Information on supplier subcontractors and overseas supplies in the supply chain is also obtained to help inform NCH's risk assessment.

NCH Group will not work with any organisation that either has or is found to be knowingly involved within either human trafficking or modern slavery.

Identification of risks together with steps taken to prevent and manage that risk

Modern Slavery is a key topic on the NCH Equality, Diversity and Inclusion Action Plan which is monitored by the NCH Equality, Diversity and Steering group. The group is made up of a diverse range of stakeholders who monitor and review policies, procedures and practices in relation to Modern Slavery.

NCH are committed to ensuring all employees receive fair remuneration for the work they perform and have job evaluated all its roles. NCH is a national living wage employer and have harmonised pay terms and conditions across the entire workforce.

Nottingham City Homes works in close partnership with Nottinghamshire Police and the Nottingham City Council's Exploitation and Modern Slavery team to achieve effective outcomes in relation to modern slavery and human trafficking. Collaborative working is also undertaken with other Councils and voluntary sector representatives to undertake safety planning and problem solving.

NCH form part of a multi-agency partnership who meet on a monthly basis at the Serious Exploitation Risk Assessment Conference (SERAC) meetings to discuss ongoing modern slavery case work. This enables NCH to take a proactive role in tackling modern slavery and building networks within the City of Nottingham.

Further to this, NCH joined the Make Nottingham Slavery Free Campaign in 2018 and continues to support this initiative.

Policies in relation to slavery and human trafficking

NCH takes a zero tolerance approach to human trafficking and slavery, in our supply chains or any other part of our business.

We have robust policies and procedures to ensure that its employees are not subject to undue influence and are treated with dignity and respect. Policies

and procedures are regularly audited to ensure we are compliant with the most up to date employment legislation to prevent unethical working practices.

Policies, procedures and strategies include:

Whistleblowing Policy - The Confidential reporting procedure (whistleblowing procedure) - NCHP068 applies to all employees and workers engaged by the Group, including contractors, agency staff, builders and drivers. It also covers disclosures relating to suppliers and those providing services under a contract with the Group. NCH is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, we expect employees, and others that we deal with, who have serious concerns about any aspects of the Group's work to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis. This Procedure makes it clear that you can do so without fear of victimisation, subsequent discrimination or disadvantage. This Procedure is intended to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace.

Safeguarding Policy/Procedure - The Children, Young People and Adults at Risk Safeguarding Procedure sets out NCH responsibilities linked to NCC's 'Nottingham and Nottinghamshire multi agency adult safeguarding procedure for raising a concern and referring'. This procedure defines what modern slavery is, identifies the signs, advises you on how cases should be reported and recorded, acting promptly, proportionally and effectively.

Equality, Diversity and Inclusion Strategy - The Equality, Diversity and Inclusion Strategy 2019 – 2022 recognises the responsibility that we share with our suppliers, to buy materials and deliver our services in an ethical manner. The Strategy incorporates how we deliver our services and treat employees in line with Legislation to tackle slavery wherever we find it. We continue to prepare a slavery and human trafficking statement each financial year which is published on our website.

Sourcing Strategy - The Sourcing Strategy 2019 - 2022 sets out how NCH will continue to drive forward the key objectives of delivering economic, social and environmental benefits to the city through procurement. It includes ethical standards as a core principle for procurement and acknowledges the important role that procurement plays in sourcing in a manner that ensures ethical standards are met, minimises the risk of social exploitation and rewards

good employment practices. Our ethical procurement objectives are to ensure the well-being and protection of work forces throughout the supply chain, that people are treated with respect and their rights are protected.

Anti-Social Behaviour and Crime Strategy - The Tackling Anti-Social Behaviour and Crime Strategy 2019-2023 applies to Nottingham City Council stock managed by NCH, housing stock developed through our registered provider and market rent subsidiary and to private tenures where NCH residents are affected by or involved in causing anti-social behaviour or Modern Slavery.

We will continue to deliver a victim centred approach to case management which focuses on the harm and impact an incident of crime has on victim(s). We will continue to Work in partnership with Community Protection and Nottinghamshire Police, to take the toughest enforcement action against perpetrators of modern slavery.

Training and capacity building about slavery and human trafficking

All our employees are required to undertake mandatory e-learning to help recognise signs of slavery, human trafficking, forced labour and domestic servitude.

Further e-learning and classroom training is provided to those of our employees who are responsible for sourcing items and services to ensure understanding of modern slavery issues from a sourcing and supply chain perspective.

An additional e-learning module and video/reading materials are provided to employees who come into direct contact with tenants in their homes and communities and are required to make referrals as a result of safeguarding reports. This training is also available to any employee who wishes to develop their knowledge further on the modern slavery topic.

Tailored safeguarding training is delivered in line with our Safeguarding procedure which is supported by senior managers who are able to support further on this specific topic.

All training is produced and delivered in line with the basic principles of the Modern Slavery Act 2015:

- how colleagues and partners can identify slavery including warning signs and Indicators
- what colleagues and partners can do to raise awareness about potential slavery
- what external help is available and details of the National Referral Mechanism (NRM)
- what is the referral path and what local support is available.

Priority reporting mechanisms are in place and communicated across the organisation via our marketing and communications team.

NCH the 'Eyes Wide Open' initiative which provides employees with an avenue to report any concerns they might have when visiting tenants or are out and about on our estates.

This year we have produced a detailed Modern Slavery Procedure explaining what Modern Slavery (including Human Trafficking), Exploitation, Cuckooing and County lines are and how NCH will deal these cases and what actions we will take and how we will support tenants.

Concerns may include:

- a property or an estate in a state - for example: abandonment, subletting, poorly kept gardens and hedges, damaged fencing, graffiti, fly tipping, anti-social behaviour
- a family who may be struggling - for example: signs of financial hardship
- safeguarding - where you feel a child, young person or vulnerable adult is being abused or is at risk of harm, neglect or exploitation
- social housing (tenancy) fraud
- modern slavery and human trafficking.
- cuckooing.

All housing patch managers and areas housing managers have undertaken classroom training with an external provider Change Grow Live (CGL) which has a key focus on drugs, gangs, county lines and exploitation and how this feeds into modern slavery.

NCH have a responsibility to provide victims of modern slavery with ongoing support and will work in collaboration with the police and social care system,

drug and alcohol support, mental health support and any other agency that will support them within sustaining their tenancy.

The Directors and Management shall be responsible for the application of this policy and ensure all activity complies with the Modern Slavery Act 2015. NCH Group is committed to making Nottingham a slavery free city and will also continue to utilise national and local resources, training and investment to ensure its successful application throughout the next financial year.

To seek advice or report suspicion of modern-day slavery call the modern slavery helpline on 0800 0121 700 or visit www.modernslavery.gov.uk/start to report online.

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