

Midland Heart Limited Modern Slavery Statement 2023-2024

1. Introduction

Midland Heart is opposed to all forms of modern slavery and human trafficking.

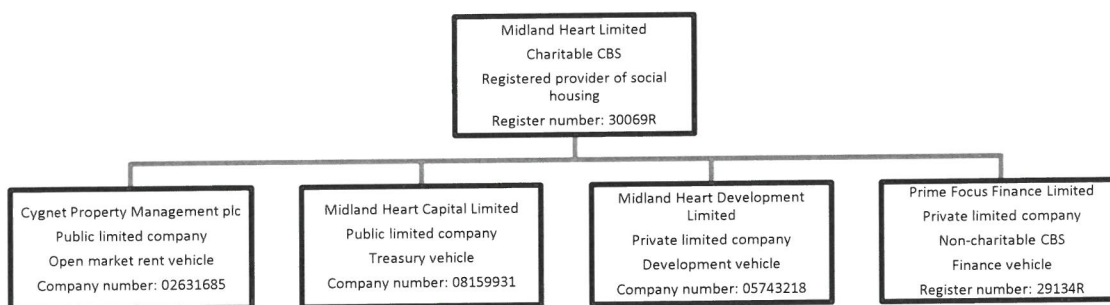
This statement sets out the key actions we have taken to combat slavery and human trafficking in our operations and supply chains for the financial year 2023-2024.

This statement is made pursuant to and is published in accordance with section 54(1) of the Modern Slavery Act 2015 for the financial year ending 31 March 2024.

2. Our Organisation and Supply Chains

Midland Heart is a leading housing and regeneration social business in the Midlands. Operating across 54 local authority areas, Midland Heart owns and manages around 33,000 homes, provides services to over 70,000 customers and employs over 1,100 staff. We provide high quality general needs housing, housing for older people and services aimed at preventing homelessness.

This statement covers Midland Heart Limited and its subsidiaries. We have set out below the legal entity structure within the Group for the financial year 2023-2024:



Midland Heart sources all Goods, Services and Works within the UK and the European Union. Our supply chains range from simple stationery requirements to asset management services, property improvements and through to IT infrastructure and software and cover Goods, Services and Works necessary to:

- Deliver front line services to residents in the properties we own and manage;
- Build new homes;
- Support the "back-office" services that keep the business operating.

Overall responsibility for compliance with the Modern Slavery Act rests with our Main Board, with responsibility delegated to the Executive Director of Finance and Growth (procurement and supply chain), the Executive Director of Corporate Resources and the Executive Director of Operations (safeguarding and vulnerable customers) to ensure that policies and procedures are implemented and maintained and that staff are aware of their responsibilities and receive relevant training. Staff

are required to ensure they carry out their roles in line with this Statement and Midland Heart's policies and procedures.

3. Policies and Processes

We have an extensive and robust framework of policies, procedures and contractual requirements in place, which contribute to the prevention of slavery and human trafficking. These policies are reviewed regularly and updated as required, to ensure any gaps are identified and to reduce risk. Key policies include:

Recruitment – ensures there are robust policies and procedures in place across the organisation including checks involving photo ID, DBS (where appropriate), references, work permits alongside practices such as paying the national living wage.

Governance and Control Framework - outlines the systems, processes, culture and values that provide Midland Heart with a robust structure. It ensures high quality, effective decision-making in all areas of strategy, performance, responsibility and accountability. Our commitment to prevent slavery and human trafficking is included in this document.

Whistleblowing Policy – specifically encourages Midland Heart staff, customers and other business partners to report any concerns related to the direct activities, or supply chains of the organisation, including those that may give rise to risk of slavery and human trafficking.

Code of Professional Conduct - makes clear to employees the actions and behaviours expected of them when representing Midland Heart. Midland Heart strives to maintain the highest standards of employee conduct and ethical behaviour.

Safeguarding and Wellbeing Policy & Procedure - demonstrates our approach to safeguarding customers, employees and other stakeholders from abuse or neglect. We have a Safeguarding Committee and Safeguarding Board to oversee this.

Procurement:

Our procurement activity is governed by the Public Contracts Regulations 2015 and our own Procurement Strategy.

The following steps demonstrate Midland Heart's due diligence in identifying areas of risk and the measures we have taken to manage risks posed:

- Suppliers have been required to confirm they comply with the Modern Slavery Act since 2016. The Public Contracts Regulations Standard Supplier Questionnaire includes questions related to modern slavery and human trafficking to ensure organisations defined as commercial organisations under section 54 of the Modern Slavery Act provide a copy of their modern slavery statement for consideration. For lower value procurements this is addressed in our Probity statement.
- Our standard Terms and Conditions require suppliers to agree to a modern slavery clause, which provides the ability for Midland Heart to carry out spot checks on the supply chain to mitigate risk.
- Our senior members of the Procurement Team are all CIPS/MCIPS qualified and annually certify in ethical procurement and supply.
- If/where unethical or high-risk practices are observed, Midland Heart will report on these to its Main Board and take steps to remedy these, including terminating third-party



relationships with contractors *etc* where required. In line with its zero tolerance commitment to modern slavery and human trafficking, Midland Heart will not continue to work with suppliers and contractors where they fail to demonstrate minimum required standards of transparency.

Contract Management:

Our **Contract Management Framework** is how we expect our Contract Managers to monitor the performance of our contractors. All suppliers procured since April 2016 have confirmed their adherence to the Modern Slavery Act. Individual Contract Managers are responsible for ensuring their contractors and suppliers are adhering to the Modern Slavery Act with respect to the contracts they are managing.

Lettings:

When letting our properties we undertake status checks, including photo ID and immigration, for potential adult occupiers, so we are confident we know who is moving into our properties.

4. Training

Since 2016 modern slavery and human trafficking has been part of our Safeguarding Training, which is a mandatory requirement for all staff to complete. We regularly review and update our training to ensure our learning remains impactful and relevant, and can be embedded back into the workplace.

Our Contract Management and Procurement training includes Modern Slavery awareness and ensures our contract managers fully understand their responsibilities. This training is mandatory for all contract managers.

5. Our effectiveness in combating slavery and human trafficking

Midland Heart uses the results of its reviews and audits to measure how effective it has been to ensure that slavery is not taking place in its business or supply chain. As a result of its efforts, Midland Heart considers the risk of modern slavery and human trafficking to be low across its business and supply chain. As such, Midland Heart does not envisage specific performance indicators on modern slavery. However, this is kept under review to ensure that should a high-risk be identified, it can be effectively monitored and influenced in a meaningful way. During the next year Midland Heart will be taking steps to review and update its procurement processes and policies in line with the requirements of the Procurement Act 2023. As part of this process we will also review the steps taken to ensure the prevention of modern slavery and human trafficking through our procurement processes.

The Midland Heart Limited Board approved this statement on 27th March 2024.

Modern Slavery Helpline:

You can find out more about Modern Slavery, report a suspicion or get help and advice from the [Modern Slavery Helpline website](#). They provide victims, the public, statutory agencies and businesses access to information and support on a 24/7 basis.

Signed : 

Chair

Date: 31st March 2024

