

## **Modern Slavery and Human Trafficking Statement**

The Modern Slavery Act 2015 had introduced an obligation on organisations to produce an annual statement of the measures they had taken to ensure there was no modern slavery (including human trafficking) in their own businesses or supply chains.

Any “commercial organisation” in any sector carrying on a business in the UK with a total annual turnover of £36 million or more is required to produce a slavery and human trafficking statement for each financial year.

If a business fails to produce the statement, the Secretary of State may seek an injunction through the High Court requiring compliance. Failure to publish a statement thereafter may result in the company being found to be in contempt of court, which may result in an unlimited fine.

The minimum standard to ensure compliance is a short basic statement. An organisation will be complying with the law even if the statement says that no steps have been taken or investigations have just begun. The Government’s intention is that transparency will drive improvements through accountability to stakeholders.

The obligation (for those it applies to) is to produce a statement of the steps taken to ensure there is no modern slavery taking place, not to guarantee that it isn’t happening.

This statement sets out the steps that we have taken in the 2016/2017 financial year.

First Choice Homes are a not for profit housing association, managing approximately 12,000 homes in Oldham, we have approximately 400 employees and we are an accredited Living Wage employer.

The current supply chain includes 490 active suppliers for this financial year with spend for this financial year at £30m plus an additional £13.5m for salaries. 48% (£14.3m) of our annual spend is delivered by businesses which are/or employ local people within 10 miles of Oldham town centre.

### **Steps taken to address Modern Slavery and Human Trafficking**

First Choice Homes started by undertaking due diligence to identify where modern slavery and/or human trafficking might be taking place within our business and supply chains during 2016 when the Modern Slavery Act came into force.

First Choice Homes will monitor modern slavery and human trafficking in line with our Anti-Slavery and Human Trafficking Policy that will be introduced to make our position on this issue clear. The policy will reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. The Policy was approved by the Board in June 2016 and communicated to all colleagues.

## **Our Supply Chain**

The current supply chain includes major national companies, regional companies and small medium enterprises together with local family businesses.

A breakdown of the spend with active suppliers for this financial year to date is as follows:

- 63 suppliers with spend above £50k
- 45 suppliers with spend between £20k and upto £50k
- 57 suppliers with spend between £10k and upto £20k
- 322 suppliers with spend upto £10k

All tender exercises now include a requirement for bidders to confirm the following:

- Bidders are to confirm that they will adhere to the First Choice Homes Anti-Slavery and Human Trafficking Policy which is provided within the tender documentation

## **Our Employees**

When we are carrying out recruitment, either for employees or agency workers, we ensure that we ask candidates to bring with them to interview proof of their eligibility to work in the UK. Ideally this would be via the candidate producing their passport. However if they either do not have a passport or it has expired then they would need to provide other evidence. To do this they would need to provide relevant documents as outlined in the Asylum and Immigration Guidance.

First Choice Homes Whistleblowing Policy is contained within the organisations Code of Conduct. This is cascaded to all new employees prior to them starting their employment as this forms part of phase one of their induction. This requires them to read the organisations policies and procedures prior to their first day. At their day one induction on their first day we check that they have read the policies and if not ensure they have time to do so within their first 4 weeks of employment.

All First Choice Homes staff have been made aware of the Whistleblowing Policy, which guides them as to how to raise a concern about, for example, modern slavery; anyone who raises a genuine concern under the Whistleblowing Policy will be protected against reprisals.

## **Our Customers**

As part of the day to day operations for customer facing employees the following guidance is accessible and communicated:

### **How Staff and Contractors can Spot the Signs of Modern Slavery**

Abuse of individuals is not always clear cut. Someone could choose to work for less than the minimum wage, or in an unsafe condition, and not necessarily be forced or deceived.

Signs of slavery are often hidden, making it even harder to recognise victims. Some are more apparent, for example:

- A First Choice Homes tenant's home taken over against the tenant's will by drug dealers to use as base from which to supply drugs
- Persons forced into prostitution and controlled
- Enforced production or growing of drugs such as cannabis.

Victims are forced to carry out housework and domestic chores in private households with little or no pay, restricted movement, very limited or no free time, minimal privacy and joint surrender in favour of a sole tenancy.

- often sleeping where they work.

Some common signs which can be identifiers of slavery:

Physical Appearance: Victims may show signs of physical or psychological abuse, look malnourished or unkempt, or appear withdrawn;

Isolation: Victims may rarely be allowed to travel on their own, seem under the control, influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work;

Poor living conditions: Victims may be living in dirty, cramped or overcrowded accommodation, and / or living and working at the same address, locks on internal doors together with lots of mattresses present in the property;

Few or no personal effects: Victims may have no identification documents, have few personal possessions and always wear the same clothes day in day out. What clothes they do wear may not be suitable for their work;

Restricted Freedom of Movement: Victims have little opportunity to move freely and may have had their travel documents retained, for example passports;

Unusual Travel Times: Victims may be dropped off / collected for work on a regular basis either very early or late at night;

Reluctance to seek help: Victims may avoid eye contact, appear frightened or hesitant to talk to strangers and fear law enforcers for many reasons, such as not knowing who to trust or where to get help, fear of deportation, fear of violence to them or their family.

All contractors are provided with First Choice Home's Safeguarding Policy and where appropriate training provided to contractors – the policy has a clear reporting mechanism for all staff/ contractors to ensure that if any concerns are noticed they will be actioned.

First Choice Homes s also working with has also put into place a commitment to support GMP and OMBC on joint operations around modern slavery and is assessing the option of offering overnight respite to victims of trafficking.

Further, First Choice Homes also make a commitment to offer a work placement to local victims of modern slavery who are resettling in the locality.

**Further Steps**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 5<sup>th</sup> April 2018.

It was approved by our Board on 16th August 2017.

Signed:

A handwritten signature in black ink that reads "V. Roche".

Vinny Roche – Chief Executive  
First Choice Homes Oldham  
Date: 29 August 2017