

## Modern Slavery and Human Trafficking Statement April 2020 to March 2021

This statement sets out the steps that First Choice Homes Oldham (FCHO) Limited and the group (including New Living Homes (NLH) Ltd) have taken in the financial year April 2020 to March 2021 to ensure compliance with The Modern Slavery Act 2015. This is in line with FCHO's Modern Slavery and Human Trafficking Policy and to minimise the risks of any association with practices which undermine the principles of safety and dignity for our customers and colleagues.

### Organisation

FCHO Limited is formed for the benefit of the community:

- Providing and managing housing, including social housing, and providing assistance to help house people and associated facilities; and
- Any other charitable object that can be carried out from time to time by a registered society registered as a provider of social housing with the Regulator of Social Housing (RSH).

FCHO Limited is a Co-operative and Community Benefit Society, registered with the Financial Conduct Authority as a Mutual Society; company number is 31138R. FCHO Limited is a 'profit for purpose' housing association and is regulated by the RSH, registration number is 4582.

FCHO Limited has a Board of Non-Executive Directors which is made up of between eight and twelve members who oversee the overall running of the company.

NLH Limited is a subsidiary of FCHO Limited set up to undertake development activities including design and build services on its behalf.

NLH Limited was registered with Companies House on 1 February 2017, company number 10438384. FCHO Limited is the sole shareholder and the Board of Non-Executive Directors are appointed by the FCHO Limited Board.

### Supply Chain

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

The supply chain for 2020/21 included 484 active suppliers with spend at £43.6m plus an additional £16.6m for salaries. 56.5% (£24.6m) of our annual spend is delivered by businesses which are within 10 miles of Oldham Town Centre and therefore likely to employ local people.

## **Employees**

FCHO Limited employs c370 colleagues. As part of our recruitment process, either for colleagues or agency workers, candidates have provided proof of their eligibility to work in the UK. All new colleagues complete an on-line induction process which includes the FCHO Limited's Modern Slavery and Human Trafficking Policy.

The Policy sets out guidance for colleagues on how to spot signs of modern slavery together with how these are to be reported in line with FCHO's Safeguarding Policy.

FCHO's Whistleblowing Policy is cascaded to all new colleagues prior to them starting their employment as this forms part of phase one of their induction. This requires them to read the organisation's policies and procedures prior to their first day. When employment commences, confirmation is required to ensure that all policies have been read.

## **Policies**

A Modern Slavery and Human Trafficking Policy is in place to ensure that we comply with the Modern Slavery Act 2015 when carrying out all activities within our business.

The FCHO's Procurement Policy is designed to ensure that we operate in a legal, ethical and inclusive manner whilst achieving best value for money; this includes enabling our procurement activity to generate social and environmental benefits.

## **Due Diligence**

We have taken time to understand the implications of the Modern Slavery Act to identify areas within our business and supply chain where the greatest risks exist; these are procurement and supporting vulnerable customers.

The following measures are in place to mitigate these risks which include:

- During all procurement exercises, bidders are required to confirm that they adhere to the FCHO Limited Modern Slavery and Human Trafficking Policy (provided as part of the tender documentation) or provide a copy of their own Modern Slavery Policy (if they meet the statutory thresholds);
- As an accredited Living Wage Employer, FCHO Limited includes in all tender documentation that it requires all bidders to confirm that they pay at least the current Living Wage rate, currently £9.50 outside of London;
- Safeguarding reporting mechanisms have been put in place to ensure that we capture and act on any reports from colleagues, suppliers, contractors whilst working with our customers;
- Ensuring that all new colleagues and temporary workers sourced via an agency have the correct checks completed such as ensuring they are eligible to work in the UK and Disclosure and Barring Security checks; and



- Working closely with our major contractors to look at how we can ensure that any sub-contractors on site are adhering to the FCHO Limited Modern Slavery and Human Trafficking Policy or the contractor's policy (if the contractor exceeds the thresholds) and how this can be evidenced

## **Monitoring and Key Performance Indicators**

The main method of monitoring effectiveness within the supply chain is the procurement evaluation process for suppliers which includes the requirement to confirm that they either comply with FCHO's Limited Modern Slavery and Human Trafficking Policy or if they have their own policy, they provide a copy and confirm adherence.

We monitor that all colleagues have been provided with and understand the Modern Slavery and Human Trafficking Policy as part of the induction process.

## **Training**

On-line induction training now includes the Modern Slavery and Human Trafficking Policy which must be read and understood.

Over the next 12 months, on-line training will include a mandatory refresher training E-learning module for all colleagues that will need to be completed on a regular basis. Completion will be monitored via compliance training reporting from the learning management system, Skillgate.

Regular safeguarding training takes place for colleagues and contractors to raise awareness of the signs to look out for when working with customers, this also has links to modern slavery.

## **Further Actions for 2021/22**

FCHO Limited will continue to raise awareness and understanding across the organisation of the risk of slavery and human trafficking.

Anti-Slavery Day (18 October 2021) provides an opportunity to raise awareness of human trafficking and modern slavery and we will mark the day with activities throughout the business to highlight good practice and focus our attention where improvements need to be made.

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 31 March 2021.

Approved by the FCHO Group Board on (date).

**Ged Lucas**  
**Group Board Chair**

**Donna Cezair**  
**Group Chief Executive**

