



## Modern Slavery and Human Trafficking Statement April 2024 to March 2025

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 2024 to March 2025 to ensure compliance with The Modern Slavery Act 2015. This is in line with FCHO's Modern Slavery and Human Trafficking Policy, which is to minimise the risks of any 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.

### 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 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.

## **Compliance**

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

## **Supply Chain**

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


The following measures are in place to mitigate risks, including:

- 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); We also include a question that asks if bidders are compliant with the Modern Slavery Act 2015 and in particular annual reporting requirements contained within Section 54
- 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;
- We stipulate that main contractors should ensure that sub-contractors that they use adhere to the terms of the procurement tender so FCHO 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.
- 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.

## **Vulnerable customers**

FCHO Limited employs c.400 colleagues, all of whom have a role in identifying and reporting signs of modern slavery.

The following measures are in place to support this, including:

- 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
  - 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.
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- FCHO's Whistleblowing Policy is cascaded to all new colleagues during phase one of their induction. This requires them to read the organisation's policies and procedures within their first six weeks. Confirmation is required to ensure that all policies have been read which is recorded on FCHO's learning management system.
- On-line training includes a mandatory refresher training E-learning module for all colleagues that will need to be completed every two years. Completion will be monitored via compliance training reporting from the learning management system.
- Safeguarding policies and reporting mechanisms have been put in place to ensure that any reports from colleagues, suppliers, contractors whilst working with our customers, are captured and acted on.
- 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.

### **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.

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

### **Further Actions for 2025/26**

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 2025) 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 2025.

Approved by the FCHO Group Board on 21 May 2025.

**Amanda Harris**  
**Group Board Chair**

**Mark Gifford**  
**Group Chief Executive**

