



Modern Slavery and Human Trafficking Statement April 2018 to March 2019

This statement sets out the steps that First Choice Homes Oldham Limited have taken in the financial year April 2018 to March 2019 to ensure compliance with The Modern Slavery Act 2015 in line with the First Choice Homes Oldham Limited 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 at work.

Organisation

First Choice Homes Oldham 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.

First Choice Homes Oldham Limited is a Co-operative and Community Benefit Society, registered with the Financial Conduct Authority as a Mutual Society. Company Number is 31138R. First Choice Homes Oldham Limited is a 'not for profit' housing association and is regulated by the Regulator of Social Housing, registration number is 4582.

First Choice Homes Oldham 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.

New Living Homes Limited is a subsidiary of First Choice Homes Oldham Limited set up to undertake development activities including design and build services on its behalf.

New Living Homes Limited was registered with Companies House on 1 February 2017, company number 10438384. First Choice Homes Oldham Limited is the sole shareholder and the Board of Non-Executive Directors are appointed by the First Choice Homes Oldham Limited Board.

Supply Chain

The current supply chain includes 540 active suppliers for this financial year with spend at circa £55m plus an additional £15.8m for salaries. 50% (£27.5m) of our annual spend was delivered by businesses which are local/or employ local people within 10 miles of Oldham town centre.

Our supply chain consists mainly of services rather than goods and we do not have any suppliers outside the United Kingdom.

Employees

First Choice Homes Oldham Limited employs c400 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 First Choice Homes Oldham Limited Modern Slavery and Human Trafficking Policy.

The First Choice Homes Oldham Limited Modern Slavery and Human Trafficking 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 First Choice Homes Oldham Limited Safeguarding Policy.

First Choice Homes Oldham Limited Whistleblowing Policy is contained within the organisations Code of Conduct. This 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 organisations 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 First Choice Homes Oldham Limited 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 First Choice Homes Oldham 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, First Choice Homes Oldham 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;
- 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 First Choice Homes Oldham Limited Modern Slavery and Human Trafficking Policy or the contractors 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 include the requirement to confirm that they either comply with the First Choice Homes Oldham 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.

We are implementing a reporting mechanism to confirm refresher training for all existing staff with a key performance indicator target of 100%.

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 mandatory refresher training for colleagues that will need to be completed on a regular basis.

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 2019/20

First Choice Homes Oldham Limited will continue to raise awareness and understanding across the organisation of the risk of slavery and human trafficking.

Anti-Slavery Day (Friday 18 October 2019) 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 5 April 2019. It was approved by the First Choice Homes Oldham Limited Board on 7 August 2019.



Vinny Roche – Chief Executive
First Choice Homes Oldham