

Building homes,  
independence  
and aspirations



## Modern Slavery Act Transparency Statement

### Introduction by Mark Henderson

We are proud of the steps we have taken to combat slavery and human trafficking at Home Group. We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains and we expect the same high standards from all of our contractors, suppliers and other business partners.

### Organisation's structure

We are a charitable Registered Provider of Social Housing in England, whose principal activities are the provision of affordable rented accommodation, the design and development of integrated health and care services and the development of homes for outright sale, affordable and supported housing.

Home Group comprises the parent Home Group Limited, together with the following organisations each of which is a subsidiary of Home Group Ltd :- Home in Scotland Ltd, Live Smart @ Home Ltd, Home Group Developments Ltd and North Housing Ltd.

We have an annual turnover in excess of £350m, have our head office in England and operate throughout England, Scotland and Wales.

This statement applies to Home Group and its subsidiaries as set out above.

### Our business

We deliver our customer facing services through three distinct business units:

**Operations:** the delivery of services to customers in rented, shared ownership (including leasehold) and supported markets across the United Kingdom.

**New Models of Care:** the design and development of integrated health and care services.

**Development:** responsible for the acquisition and development of all new properties and regeneration projects.

## Our supply chains

Home Group procures a wide range of goods and services via a diverse and varied supply chain, including:

- Property related services (construction and maintenance)
- Facilities management services
- Communications and IT equipment services
- Temporary/Agency staff
- Recruitment agencies
- Various professional services
- Office equipment and supplies
- Utilities

## Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our business complies with the Ethical Trading Initiative (ETI) Base Code and adheres to the nine core principles that form the basis of that code.

We have robust HR policies and procedures in place and a Working Professionally Policy to ensure the fair treatment of all colleagues. We comply with all applicable employment legislation relating to colleague terms and conditions, including payroll and we invest in supporting the health and wellbeing of our colleagues.

Our Supplier Code of Conduct reflects 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.

Our Safeguarding policies include specific guidance for colleagues on how to recognise signs of abuse, including slavery, human trafficking, forced labour and domestic servitude among our customers and how to respond to and escalate any concerns. We record modern slavery as an independent safeguarding category across our rented and supported housing so if any colleague has a concern they can raise it directly. We have been directly involved, through our care and support business, in supporting a number of victims of modern slavery - in particular a group of vulnerable men who had been freed from slavery and exploitation following a high profile case in 2012, which resulted in 5 members of a Traveller family being found guilty of conspiracy to require a person to carry out forced or compulsory labour.

We also carry out programmed tenancy audits of our properties and have trialled initiatives using external agencies such as Experian to assist in ensuring that our properties remain occupied by the legal tenant and are not used for illegal purposes, including slavery.

## Due diligence processes for slavery and human trafficking

In terms of colleague recruitment, we undertake all relevant pre-employment checks prior to colleagues being employed, to ensure they are eligible to work in the UK. We carry out fair and transparent recruitment processes and ensure that our recruitment agencies comply with these requirements in the provision of agency staff.

As part of our initiative to identify and mitigate risk we require our suppliers, as part of our tender procedures, to complete a self-assessment Suitability Questionnaire (SQ), which includes questions targeted at slavery and human trafficking risk. The SQ is used to determine the risk profile of suppliers for supplier sustainability issues. Suppliers completing a self-assessment questionnaire are also expected to provide evidence to support their responses to address areas such as discrimination, freedom of information, forced labour and

child labour. Also as part of the tender process, our suppliers are required to sign up to our Supplier Code of Conduct.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

### Supplier adherence to our values and ethics

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values and ethics, we have in place rigorous selection, due diligence and tender processes which help ensure our suppliers and their supply chains are slavery free. Depending on the suppliers risk profile, approved suppliers may be required to upload a statement to our supplier portal to confirm their continued compliance with our Supplier Code of Conduct, including their commitment to anti-slavery and human trafficking on an annual basis.

As part of our Supplier Risk Assessment process and ongoing monitoring of our supply chain, we carry out regular reviews to ensure suppliers are assessed and the information held on our supply base is kept up to date. Our contracts give us the provision to conduct supplier audits or on-site assessments dependent on the nature of the goods or services being provided and also on the industry sector in which the supplier operates. The frequency of these audits or on-site assessments will be dependent on the risk profile of the contract and/or supplier. For those suppliers deemed to be high risk, a standard approach to auditing is adopted which focusses on interviewing the management and employees to identify any worker exploitation in areas such as recruitment, pay, entitlements, treatment, accommodation and grievance mechanisms. If an audit reveals risks of modern slavery, this could result in termination of the supplier's contract

We encourage anyone, including colleagues, subcontractors, suppliers and customers to report in good faith any issue or concerns about potential unethical business practices, such as fraud and bribery or slavery and human trafficking through our confidential external whistle-blowing hotline.

As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adult or children.

### Training

We provide essential safeguarding and annual refresher training to all staff, which covers how to spot the signs and indicators of modern slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 March 2020.

Signature



Chief Executive  
Home Group Limited  
Date: 30 July 2020



Editable body copy

Editable body copy