

# Modern Slavery Act Transparency Statement

## INTRODUCTION FROM 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 provision of care and support services and the development of low cost home ownership schemes.

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 £330m, 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 and client facing services through three operational businesses:

**Customer Service:** delivers core housing, maintenance and neighbourhood services to our customers across the United Kingdom.

**Care and Support:** delivers care and support services to a range of vulnerable client groups across the United Kingdom in both residential and non-residential based services.

**Enterprise and Development:** oversees the development of new properties for rental or sale and large scale 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 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 staff on how to recognise signs of abuse, including slavery, human trafficking, forced labour and domestic servitude among our customers and clients and how to respond to and escalate any concerns. We have been directly involved, through our care and support business Stonham, 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**

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 Pre-Qualification Questionnaire, which includes questions targeted at slavery and human trafficking risk. The PQQ 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. On an annual basis, approved suppliers are 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.

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. This may include 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, customers and clients 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 – Expolink.

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.

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<sup>st</sup> March 2016.

SIGNATURE

A handwritten signature in black ink, appearing to read 'Mark Hill', written in a cursive style.

CHIEF EXECUTIVE

HOME GROUP LIMITED

Date: 31 March 2016