

## **Solihull Community Housing's Modern Slavery Statement – 2018/2019**

In accordance with the Modern Slavery Act 2015, Solihull Community Housing (SCH) makes the following statement related to financial year 2018/2019. SCH is committed to ensuring that a culture is maintained which is intolerant to modern slavery, corruption or bribery or fraud.

SCH will continue to ensure that labour conditions for employees within the business or workers within our supply chain are considered at all levels and to a high standard.

### **About Solihull Community Housing**

SCH is an Arm's Length Management Organisation (ALMO) which was set up on 1 April 2004 to manage the housing stock owned by Solihull Metropolitan Borough Council. SCH delivers landlord services on behalf of the Council under a management agreement which was re-negotiated in 2014.

We currently manage 10,000 tenanted properties and 1,181 leasehold properties and employ directly approximately 275 staff which includes a direct labour organisation.

There is only one shareholder which is Solihull Metropolitan Borough Council; SCH works closely with our parent Council and is governed by a Board of 12 members, made up of Council nominees, tenants and independent members.

SCH offices are based in Solihull, West Midlands.

### **Policies**

SCH maintains adherence to the following policies, associated with slavery and human trafficking:

- Safeguarding Policy
- Prevention of Bribery Policy
- Guidance for Preventing Fraud

#### Safeguarding

SCH embraces its responsibility to safeguard and promote the welfare of children and vulnerable adults when carrying out our work. SCH has a comprehensive Safeguarding Policy Statement which all staff are expected to read and work within. SCH actively participates in multi-agency partnership arrangements to protect and safeguard people.

#### Anti-bribery and preventing fraud

SCH is committed to the highest standards of ethical conduct and integrity in its business activities and is committed to the prevention, detection and deterrence of bribery and fraud. The policy states that SCH will not accept any fraud or corruption. This applies to all employees, members and officers

of SCH and to temporary workers, consultants, contractors and agency staff acting for, or on behalf of, SCH.

### Recruitment

SCH's recruitment processes include robust procedures for vetting new employees, which ensures they are able to confirm their identities and qualifications, and are paid directly into an appropriate personal bank account. To comply with the Asylum, Immigration and Nationality Act 2006, all prospective employees are asked to supply evidence of their eligibility to work in the UK. References are also requested and followed up.

### Pay

SCH has a Pay Policy Statement which makes SCH's approach to setting the pay of its employees transparent. It operates a Job Evaluation Scheme to ensure that all employees are paid fairly and equitably.

### Whistleblowing

SCH encourages all its employees, customers and other business partners to report any concerns related to the direct activities or the supply chains to SCH. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. SCH's whistleblowing policy is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can raise these via either their manager, a senior manager or via the Council's Head of Audit Services.

### Code of Conduct

The SCH code of conduct makes it clear to employees the actions and behaviour expected of them when representing the SCH. SCH strives to maintain the highest standards of conduct and ethical behaviour in all its operations and when managing our supply chains. Any breaches are investigated by the SCH.

All policies are updated in accordance with changes to legislation or procedure.

## **Due Diligence**

SCH currently works with around 90 contractors and suppliers, delivering works and services under the following four categories:

- Asset Management
- Facilities Management
- Corporate and Customer Services
- Housing Management

SCH requires its officers to consider all aspects of relevant law when spending public money with third parties, including compliance with the Modern Slavery Act.

All major procurement processes are subject to a selection process, which involves the evaluation of each organisation's approach to the Modern Slavery Act, allowing SCH to use modern slavery as a contributory factor in the shortlisting of suppliers. Prospective contractors will be given a view of the policies and requirements before the tender stage. New contractors will be asked to sign up to SCH's own policies at the contract award stage.

For existing contractors, SCH is in the process of reviewing its Contract Review documentation and modern slavery will feature on the agenda for the annual review of all contracts. All existing Contractors will be requested to confirm their commitment to addressing modern slavery.

Although due diligence sits with the SCH Procurement Team for major procurement processes, all SCH employees are encouraged to consider ethical purchasing wherever possible. Where a selection process is not applicable, the purchasing officer must ensure all appropriate terms and conditions issued to a supplier or contractor refer to the Modern Slavery Act.

Any concerns regarding modern slavery or human trafficking will be investigated and will be raised with the relevant Senior Manager or Executive Director in the first instance.

### **Partnership working**

SCH works in partnership with a wide range of agencies to prevent neglect and abuse, to detect and report occurrences and to support victims. We are working to address crime, disorder and substance use. A key priority within the SCH's work will be to extend our working together in localities and create aligned and streamlined services that can respond to local issues.

## **Risk Management**

Around 33% of SCH's contracts are works or services contracts with a higher risk of slavery and human trafficking taking place due to the lower cost of labour within the maintenance sector.

All contracts will be assessed for this risk and any SCH employees managing a 'high risk' contract will be expected to maintain a risk register detailing any mitigating actions. All risks will be reviewed in accordance with SCH's annual review guidance.

Risk assessments are completed and documented initially on the Risk Log document presented to the SCH Project Review Board which forms part of the approval process for new and existing contracts. Where there is a potential risk for of modern slavery or human trafficking to exist this will be highlighted as part of the assessment.

As far as possible, tenders will be analysed to ensure suppliers and contractors are reflecting ethical and fair labour terms and conditions within their prices.

## Measuring effectiveness

SCH is considering the following indicators in order to effectively ensure modern slavery and human trafficking is not taking place within its business:

- Extend contracts with suppliers who demonstrate a commitment to the appropriate labour standards, subject to other areas of satisfactory performance
- Make each supplier's approach to modern slavery and human trafficking a significant part of selection and shortlisting
- Demonstration of each supplier's willingness to work collaboratively with SCH and other bodies to improve labour conditions
- Improving supplier loyalty by offering longer term contracts

## Training

SCH is committed to Modern Slavery training for its staff. This mandatory training will be delivered to ensure continuity of our messages on Slavery.

SCH will identify and prioritise its training and development needs in relation to modern slavery based on:

- The degree and nature of contact practitioners / professionals have with members of the public including children, young people, families and vulnerable adults; and
- The knowledge and understanding of modern slavery that they need to fulfil the requirements of their role, including whether or not they are required to report into the National Referral Mechanism.

SCH supports the regional approach to a tiered level of training that groups staff into high, mid and low priority:

### High Priority:

These staff will have roles which fit into one or more of the following descriptions: they work predominantly with the public including children, young people, families and vulnerable adults; they have specialist safeguarding responsibilities; they are operational managers for frontline staff; they have senior management responsibility for services to the public.

Staff in this category will receive training that provides them with a good understanding of modern slavery including recognition of vulnerabilities and knowledge of how / where to refer into the National Referral Mechanism.

### Mid Priority:

These staff may have roles which bring them into contact with members of the public. They are not providing direct support to them, but they may be providing other services such as maintenance works.

Staff in this category will be given training that provides a good understanding of modern slavery including recognition of vulnerabilities and knowledge of how / where to refer.

**Low Priority:**

These staff will have no contact with members of the public. Following training, staff will have a basic awareness of modern slavery to include recognition of vulnerabilities and knowledge of how / where to refer.

Initial training will be delivered to all existing employees with annual refresher training and an ad-hoc approach to training for new employees.

There is also a proposal in place to offer electronic guidance and training to SCH contractors and suppliers in order to ensure understanding of the Act.

**Responsibility**

Responsibility for the implementation and review of this and associated policies sits with the Executive Management Team, supported by the Head of Policy and the SCH Procurement Team.