



Policy Control	
Policy Name	Modern Slavery & Human Trafficking Statement
Policy Owner	COO
Author	Company Secretary
Version No.	1
Approved by Chief Executive	Yes
Date of Implementation	April 2024
Date of Last Review	April 2024
Date of Next Review	April 2025
Published on Website	No

## **Modern Slavery and Human Trafficking Statement**

### ***Introduction***

The Modern Slavery Act 2015 ('the Act') seeks to prevent the exploitation of workers and to stop human trafficking.

At Reliance Social Housing we do not tolerate any form of exploitation and we are committed to preventing modern slavery and human trafficking in our business and our supply chains, including taking steps to ensure that companies operating within our supply chains comply with the principles in the Act.

As a registered provider of social housing, we operate with a strong sense of social purpose and ethical responsibility. Our work is focused on supporting the welfare of our customers, including those who are vulnerable or require additional support to live independently. We also aim to be an employer of choice for all colleagues who choose to work with us.

This statement sets out the steps Reliance Social Housing has taken to address slavery and human trafficking during the financial year 1st July 2023 to 30th June 2024.

### **Structure of Reliance Social Housing**

Reliance Social Housing CIC predominantly operates across the West Midlands region. Our business activity is entirely UK based.

Most of our services relate to properties provided by Managing Agents within the region.

### ***Policies, Training and Awareness***

Our People (HR) policies operate in line with the principles of the Act and help to prevent cases of modern slavery throughout our business. Our policies are clear that no form of slavery or exploitation will be tolerated and are reviewed frequently to ensure they remain up to date.

### ***Safeguarding***

We recognise that identifying and preventing slavery and human trafficking is mainly an issue of human welfare. Our Safeguarding Policy sets out clear procedures to identify, report and refer cases to the appropriate authorities where appropriate and any colleague may report concerns about modern slavery using our internal safeguarding reporting system.

To support this, safeguarding training for all colleagues is mandatory to ensure that everyone who works for Reliance Social Housing has good awareness of situations which suggest vulnerable people may be being exploited. This training includes spotting the signs of potential exploitation of our residents. The principles included in our

training can be equally applied to the exploitation of colleagues or other people we work with.

### ***Whistleblowing***

We support anyone working directly for us or indirectly within our supply chain to raise concerns, in confidence, about any criminal offences including modern slavery or human trafficking.

Our Whistleblowing Policy and Procedure is well established and is designed to make it easy for anyone to make a disclosure without fear of retaliation.

### ***Code of Conduct / Ethics***

Our Code makes clear to all colleagues the behaviour that is expected from them when representing our organisation. We strive to maintain the highest standards of conduct and ethics in all aspects of our work.

In addition, all prospective tenants must provide evidence of their eligibility to remain in the UK before they are offered a home, which is stipulated within our vetting procedures. This is a measure used to help ensure our residents have not been subject to illegal trafficking.

We also engage with third party specialist providers and our network of housing sector and local authority partners to identify up to date advice and guidance, sourcing training from subject experts where this is available.

### ***Procurement and Supply Chains***

We are committed to ensuring that our suppliers adhere to the highest standards of ethics and ensure that our contracts make it clear that serious violations of our policies will result in termination of the business relationship. Our suppliers are required to comply with the Act, to follow our policies and where applicable, to understand the needs of the vulnerable people we work with.

The supply chains of some parts of our business are complicated. Each area of our business has explicit responsibility to comply with our Procurement Policy and procedures and to regularly review its supply chain to identify areas of risk of modern slavery and human trafficking.

All suppliers and contractors, regardless of value and provision of service, are required to complete Supplier Assessment Form which meets the standards of the Standard Selection Questionnaire.

The Supplier Assessment Form asks whether suppliers are defined by section 54 of the Act and if so questions compliance with the annual reporting requirements. The form

also asks suppliers to demonstrate that their workforce is free from exploitation and where turnover is above £36m provide a copy of their Modern Slavery Statement. Reliance Social Housing ensure all formal tendering activities are in accordance with legislative and ethical requirements. This considers Modern Slavery to ensure that to the best of our knowledge the companies we procure from are responsible and paying the living wage, as required, have not breached and comply RSH policies under the Modern Slavery Act 2015.

Wherever possible we buy from suppliers via framework agreements such as Crown Commercial Service (CCS) who have a government wide strategy to tackle this issue. <https://www.crowncommercial.gov.uk/news/tackling-modern-slavery-what-ccs-is-doing>.

Where that is not possible, suppliers will demonstrate their compliance via the Supplier Assessment Form .

Beyond that our formal contracts do have a right to audit, although we have not exercised this. In practice that would mean a physical inspection of offices and records if we suspected a breach of the legislation.

Whilst they are not infallible, we believe the above checks are proportionate to both our legal and moral compass in endeavours to avoid procuring from any supplier in breach of the Act.

We manage a framework of contractors who must sign up to Reliance Social Housing's policies to work on our behalf. All new contractors are required to confirm they comply with our policies and the Act. Anyone bidding for work must confirm that they comply with the Act before submitting a bid. An annual review of all framework contractors takes place to ensure that supporting documentation is up to date and relevant. These confirmations give us some confidence in our supply chain, but it is recognised that this does not completely mitigate the risk, especially of long supply chains where we have no right to audit.

### ***Employees and other workers***

We treat all our colleagues fairly and have robust measure in place to ensure this, including:

- Robust recruitment processes including verifying people's identity and their right to work in the UK before starting work with us.
- Monitoring rates of pay and the calculation of the legal deduction of wages,
- Paying at least the Voluntary Living Wage, or approved apprentice salaries,
- Ensuring that colleagues take frequent breaks and are not encouraged to work in excess
- of the number of working hours permitted by law.

- Making salary payments directly to employees and not delaying or withholding payments without prior notification and in line with our policy.

### ***Effectiveness***

As an organisation, Reliance Social Housing strive for continual improvement. Regular reviews, led by the Head of Governance are in place to discuss, agree and undertake actions to enhance our processes to further mitigate the risks and ensure awareness throughout our organisation.