



## **Modern Slavery and Human Trafficking Statement 2023**

### **Review date: May 2024**

#### **Introduction**

This statement sets out Nottingham Community Housing Association's (NCHA) actions to identify all potential modern slavery risks related to our business and to put in place steps that are aimed at minimising the risks of modern slavery or human trafficking in our own business and supply chains.

As a Registered Provider, NCHA recognises our duty to help combat modern slavery and human trafficking. This statement is an expression of our commitment to improving our practices to combat modern slavery and human trafficking in our corporate activities and supply chains.

In the last 12 months NCHA has:

- Continued to raise awareness about Modern Slavery among colleagues by:
  - Including modern slavery and human trafficking awareness into our induction procedure
  - Highlighting modern slavery and human trafficking in other learning interventions, specifically our learning modules on Safeguarding and Domestic Abuse
  - Continuing to provide a range of resources and relevant news stories to all colleagues via our Intranet
  - Publishing our statement and plan internally as well as externally

#### **NCHA's organisational structure and supply chains**

This statement covers the activities of NCHA and its subsidiary companies.

The Nottingham Community Housing Association group of companies is a housing and care organisation operating across the six counties of the East Midlands. In the last 12 months as a Group we:

- Provided over 10,000 homes for tenants and leaseholders in the East Midlands
- Delivered 905,000 hours of care and support

The Group of companies is led by Nottingham Community Housing Association, which is registered as a Community Benefit Society with a charitable purpose. NCHA is committed to providing and managing housing for people in need and offering vital care and support services.

The Association's supply chains are drawn mainly from the construction, property maintenance and adult social care market. NCHA operates in England and had an annual turnover of c£91 million in 22/23. NCHA has assessed the risks of modern slavery and human trafficking as follows:

#### *High risk activities*

NCHA does not believe there to be any high-risk operations within the work of the company and its supply chain with regards to modern slavery and human trafficking.

#### *Medium risk activities*

- Supply chains linked to house building and property maintenance as a result of the organisations' reliance upon external contractors to undertake a high percentage of the organisations building and maintenance work.

#### *Low risk activities*

- Supply chains in the provision of agency staff predominantly in adult social care.

### **Responsibility**

Responsibility for NCHA's anti-slavery initiatives is as follows:

- **Policies:** There is a scheme of delegation across NCHA's Board, Executive Team and Senior Leadership Team to ensure that each policy which relates to our management of modern slavery is overseen and signed off at the appropriate level. Policies are reviewed on a rolling basis in response to longevity, audit, statutory or regulatory change and customer and partner feedback.
- **Risk assessments:** High level risk assessment and risk management is undertaken by an internal Compliance & Risk Panel and our Audit and Risk Committee; with all risks, controls and assurances being signed off by the Board of Management on a biannual basis. All Directors are responsible for assessing the risks associated with modern slavery and human trafficking with the Chief Executive assuming specific responsibility for those activities assessed as high risk.
- **Investigations/due diligence:** Individual Directors with assistance from Internal Audit and Human Resources are responsible for investigating any suspected instances of modern slavery and human trafficking. To date, no instances have been highlighted which require investigation.
- **Training:** NCHA's learning and organisational development team, under the leadership of the Head of People, are responsible for sourcing and making training available on modern slavery and human trafficking to colleagues.

### **Relevant policies**

NCHA has the following policies that describe its approach to the identification of modern slavery risks and the steps to be taken to prevent modern slavery and human trafficking in its operations:

- **Whistleblowing Policy (formally referred to as **Speak Out Policy**).** NCHA encourages all its colleagues/workers, customers and other business partners to report any concerns related

to the direct activities, or the supply chains, of the Association. This includes any circumstances that may give rise to an enhanced risk of modern slavery or human trafficking. This policy has been reviewed in the past year.

- **Recruitment Policy.** NCHA operates a comprehensive and transparent recruitment policy which is subject to the oversight of the Human Resources team and periodic internal audit.
- **Employee Code of Conduct.** NCHA's Code makes clear to employees and Board Members the actions and behaviours expected of them when representing the Association. NCHA strives to maintain the highest standards of employee conduct and ethical behaviour.
- **Procurement Policy.** NCHA makes use of Cabinet Office's Standard Selection Questionnaire to ensure that all relevant suppliers have a robust Modern Slavery Act statement in place. The application and updating of this policy, as well as the general operation of its suppliers, is monitored through NCHA's developing contract management processes.
- **Recruitment/Agency workers.** NCHA now uses a Managed Service Provider approach to source the majority of agency workers. As part of our contract with our provider, or where direct agency contact is required, we use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency before accepting workers from that agency.
- **Safeguarding Policy.** NCHA's Safeguarding Policy identifies Modern Slavery as a form of abuse and details clear procedures for staff to follow if and where abuse is suspected.

#### **Actions for 2023/24**

- Continuing to ensure all colleagues have awareness of modern slavery.
- Continue to review our supply chain and ensure our procurement processes are managed appropriately. In particular we will continue to develop our contract management processes to assist with the monitoring of contractors in delivery of, amongst other things, their Modern Slavery Act Statements.
- Reviewing how we work with our Managed Service Provider to improve control and co-ordination of activity to further reduce risks in this area

#### **Our effectiveness in combating modern slavery and human trafficking**

Any suspected incidence of modern slavery or human trafficking would be immediately reported to the Executive Team in the first instance, and then NCHA Board. It would then be dealt with appropriately.

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 31 March 2024.

Chief Executive: Paul Moat