

## **Castles & Coasts Housing Association (CCHA) Limited Modern Slavery Act Statement 2022**

**The Modern Slavery Act 2015 requires organisations supplying goods or services with a turnover of above £36 million to prepare and publish an annual Modern Slavery Statement.**

The Statement sets out the steps the organisation has taken during the financial year to ensure that slavery or human trafficking is not taking place in its business or supply chain.

### **Introduction**

We are proud that CCHA has a zero-tolerance approach to modern slavery and human trafficking, and we recognise our role within our wider society to do all that we can to eliminate it.

We are committed to acting ethically and with integrity in all business dealings and relationships and are putting in place effective systems and controls which we are monitoring to ensure modern slavery is not taking place within our business or our supply chains.

Our cross-departmental working group continues to review our approach to modern slavery and drive forward improvements we have identified.

We expect our staff to report concerns and we commit to act upon those concerns.

### **Organisation Structure**

CCHA is a traditional Registered Provider with over 7,000 properties across the North of England. The Company's principal activities are the development and management of rented and leasehold housing. CCHA provides some of its maintenance and services through its own internal labour force. The Association also works in partnership with other associations and seeks to develop innovative delivery solutions for its maintenance services to customers.

The Association has a broad mix of stock, with its portfolio split between general needs (77%), supported and older persons' housing (9%), and leasehold accommodation (14%). The Association's properties are spread across 15 local authorities in the North of England, with the five largest stock holdings in Allerdale (47%), Carlisle (13%), South Lakes (7%), Sunderland (6%) and Eden (6%).

The Association is regulated by the Regulator of Social Housing (**RSH**) and is required to comply with the RSH Regulatory Code.

### **Policies & Procedures**

Our policies and procedures support our commitment to eliminating modern slavery and human trafficking in our supply chains or in any part of our business and these are reviewed at least every three years. Relevant policies include:

- Safeguarding Adults & Children Policy
- Conduct Becoming Policy
- Code of Governance
- Dignity at Work Policy
- Equality & Diversity Policy

- Anti-Fraud & Bribery Policy
- Health & Safety Policies
- Recruitment Policy
- Wellbeing Policy
- Whistleblowing Policy
- Domestic Abuse Policy
- Anti-Social Behaviour Policy
- Training & Development Policy
- Lettings Policy
- Financial Regulations Policy
- Procurement & Tendering Procedures
- Remuneration Policy
- Employment, Housing and Contract Awards to Staff, Members and their Family Members Policy

As these policies are reviewed, explicit reference to modern slavery is being included.

Key within these are policies which govern our human resources (**HR**) practices, especially those relating to the recruitment of new staff such as 'right to work in the UK' checks. We comply with all applicable UK employment legislation and invest to support the health and wellbeing of our staff.

Our Safeguarding procedures include guidance for staff on abuse, including slavery, human trafficking, forced labour and domestic servitude, enabling staff to identify, respond to and escalate any concerns.

### **Supplier Adherence to our Values**

CCHA manages a diverse supply chain to procure goods and services including:

- Property related services (construction and maintenance)
- Office equipment and supplies
- Utilities
- Various professional services
- Communications and IT services
- Recruitment services

Our Supplier Code of Conduct reflects our commitment to acting ethically in our business relationships and our requirement that suppliers commit to equivalent ethical standards. We continue to strengthen our practices and establish 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 where a disclosure of modern slavery is made.

To ensure that suppliers comply with our values and ethics, we have introduced rigorous selection, due diligence, and tendering processes. To be included on the Approved Vendors List, suppliers are required to confirm their compliance with our Supplier Code of Conduct, including their commitment to anti-slavery and human trafficking.

Standard contracts contain contractual requirements that suppliers comply with the requirements of the Modern Slavery Act.

We encourage 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. We have introduced a modern slavery checklist for supplier / site audits which has been piloted this year and the outcomes recorded on our Safeguarding IT system.

CCHA maintains a register of all contracts and suppliers, enabling us to identify those who present a higher level of risk to the business, including in relation to modern slavery, which enables us to focus our due diligence activities.

Our Procurement Policy and Procedure has been reviewed to enhance our governance in relation to tendering and supplier selection, embedding due diligence on the supply chain in relation to modern slavery, into our procedures.

### **Due Diligence Processes for Slavery and Human Trafficking**

Due diligence in relation to our HR activities is well developed, with pre-employment checks such as eligibility to work in the UK and Disclosure Barring Service (DBS) checks conducted as appropriate.

In relation to our lettings practices, we conduct pre-tenancy checks with applicants for our properties including confirmation of:

- Their right of residence
- Their work/economic status
- Tenancy reference checks

CCHA does not permit the sub-letting of General Needs properties.

Once properties are let, staff conduct a 1-month and 9-month visit and the checklist for this incorporates modern slavery requirements – specifically checks to ensure the property is occupied by the legal tenant and is not used for illegal purposes, including slavery. Any concerns arising from these visits are dealt with through safeguarding procedures and recorded on the appropriate systems.

The Procurement Team has implemented structured supplier checks using questionnaires and checklists. Regular reviews are carried out to ensure suppliers are assessed and the information held is up to date. This may include supplier audits or on-site assessments, depending on the nature of the goods or services being provided and the industry sector in which the supplier operates. The frequency of these audits/assessments will be dependent on the risk profile of the contract and/or supplier. If an audit reveals risks of modern slavery, this could result in termination of the supplier's contract.

This year we have raised awareness of modern slavery on our development sites using posters, providing a route for any concerns to be raised confidentially. Modern slavery has also been added to the standard agenda for regular site meetings with our contractors.

### **Training**

Our policies are supported with training for all staff at induction and annually thereafter to recognise the signs of slavery, human trafficking, forced labour and domestic servitude.

During the year we have raised the issue of modern slavery at all levels of the business to generate awareness that we have a shared responsibility to address this and share progress with our cross-departmental action plan.

This year we have:

- Trained new members of staff, at our corporate induction, on the signs of modern slavery and how to report concerns
- Delivered adults and children safeguarding refresher training for all staff
- Made modern slavery awareness online training available to our smaller suppliers
- Provided specialist modern slavery training to employees who lead on procurement and safeguarding.

### **Our Ongoing Commitment to the Modern Slavery Act**

We will continue to review our approach to modern slavery across the business, maintaining awareness of the issue and considering new ways to mitigate the risk of it taking place within our organisation, our properties, or our supply chain.

We will continue to work in partnership with other agencies, including the Police and Local Authorities, to identify cases of slavery and human trafficking and support appropriate remedial action.

We will continue to formalise our due diligence activities with suppliers and partners to minimise the risk of modern slavery in our supply chains.

### **Declaration**

This statement has been formally approved by CCHA Board on 22<sup>nd</sup> March 2022.

**Simon Roberson**  
**Chair of the Board (on behalf of the Board)**  
**Castles & Coasts Housing Association**