



Stockport Homes Group Modern Slavery Statement 2024

This statement sets out Stockport Homes Group's (SHG) commitment to preventing modern slavery and recognising signs of modern slavery within all areas of its business activities.

SHG fully supports the principles of the Modern Slavery Act 2015 (MSA), in eradicating modern-day slavery, which encompasses human trafficking, slavery, forced labour and servitude.

1. Organisation structure and supply chains

Stockport Homes is an Arm's Length Management organisation (ALMO) that manages and maintains housing stock across the Borough on behalf of Stockport Council. SHG delivers a range of services to a varied customer base (including commercial customers).

There is a group structure in place with subsidiary companies that deliver SHG's objectives and ambitions. These are:

- Three Sixty, the construction / commercial company
- SKylight, the charitable company
- Viaduct, the development company.

This Statement applies to all entities that form part of SHG. You can find out more about Stockport Homes Group [here](#).

With over 700 employees, and 12,000 properties being managed, SHG's Mission of "One Team, Transforming Lives" is evidenced in its approach as a responsible business to:

- Providing excellent customer service and treating all customers and suppliers fairly and transparently.
- Working within agreed legislative and regulatory requirements.
- Securing value for money at all times and protecting public resources from misuse.
- Procuring goods, services and works compliantly and to ensure business needs are met.
- Ensuring robust supply chains with strong due diligence and contract management of suppliers.

The supply chain across SHG is varied and diverse. It is managed by individual contract managers, with a centrally agreed approach to procurement and value for money in place. All companies within SHG follow the same Contract Procedure Rules for procuring goods / services / works. They set out the framework for procurement across the business, the requirements for contract management and oversight of suppliers and how SHG adheres to legal requirements.

2. Policies in relation to slavery and human trafficking

SHG recognises that embedding anti-slavery and human trafficking practices across all areas of business is a fundamental requirement of the legislation and a necessary step to ensure compliance.

SHG has a range of policies and procedures in place which work together to ensure the risk of modern slavery is minimised as far as possible.

These include:

- Value for Money Strategy
- Procurement Strategy
- Contract Procedure Rules for Procurement
- Corporate Fraud Policy
- Safeguarding Policy
- Code of Conduct and Contract of Employment
- Whistleblowing Policy
- Recruitment and Selection Policy
- Managing Attendance Policy
- Grievance / Disciplinary Policy
- Eyes Wide Open Policy
- Anti-Social Behaviour Policy
- Good Neighbourhood Management Policy
- Health & Safety Policy
- Financial Regulations and Scheme of Delegation
- Risk Management Strategy and Framework
- Equality, Diversity and Inclusion Strategy

These strategies and policies are brought to the attention of colleagues at induction and are available on the staff intranet at all times. Periodic reviews are undertaken of these strategies and policies to ensure they remain accurate, up to date and fit for purpose. Updates are publicised to colleagues through the intranet, weekly colleague newsletter, team meeting content and through training where appropriate.

3. Due diligence process

SHG has a number of processes in place to safeguard against the risk of modern slavery. SHG has a strong set of core values that puts customers at the heart of service delivery and decision making. SHG expects all suppliers, contractors and partners to adhere to these same values to assist in preventing human trafficking and slavery. This is made clear in all procurement and contractual documentation issued to suppliers.

Within all tender processes, suppliers are asked to confirm that they comply with the Modern Slavery Act 2015. Suppliers' modern slavery statements are verified as part of the evaluation of tenders. In addition, all suppliers are required to submit copies of their Health and Safety and Equality, Diversity and Inclusion Policies for evaluation. These are mandatory submissions.

There are processes in place to challenge abnormally low tenders, which could be deemed to be an indicator of a breach in labour law (e.g., not paying wages correctly / minimum wage). Such tenders will be investigated further in order that SHG can exclude them or seek appropriate assurance that all relevant labour laws are being adhered to. As a potential indicator of the existence of modern slavery, this is a crucial step in the tender evaluation process.

Suppliers are asked to declare from the outset if they intend to use subcontractors, and if they are, they must provide evidence of who they are, how they have recruited them, that they have completed necessary due diligence and can provide assurance to SHG on their suitability to work on an SHG contract. SHG's Standard Terms and Conditions prevent suppliers from issuing work to subcontractors without SHG's prior agreement, which provides a control mechanism during the life of the contract.

Site visits will be undertaken by SHG to visit premises relating to high value, high risk contracts to obtain assurance over working practices. References are also asked for and verified before entering into a contract with any supplier / contractor. This is a key stage in verifying the robustness of the tender submitted and the tenderer's suitability to work for SHG.

Once awarded a contract, suppliers will be required to take part in regular contract management meetings as part of SHG's ongoing approach to contract management and submit information on an annual basis to verify they remain a bona fide contractor.

In terms of recruiting employees to work at SHG, there are strong and robust recruitment processes which all managers must follow. All prospective employees undergo an identity and "Right to Work" check, have their recent employment history checked and any mandatory qualifications checked. Two recent references are taken up prior to an offer of employment being made, with one being their current employer. These are mandatory elements of the recruitment process.

Where required, employees go through a Disclosure and Barring Service (DBS) check where this is a specific requirement of their role. SHG maintain a register of roles which require a DBS and process these checks, ensuring they remain up to date at all times.

4. Risk assessment and management

SHG has an embedded Risk Management Framework in place. Risk management processes identify and evaluate key corporate risks, and these are then added to risk registers. Controls are put into place to manage these risks to an acceptable level. These registers are monitored on a quarterly basis and report to Executive Leadership Team and Board Members.

Audit and Risk Committee receives data on whistle blowing and incidents of fraud which may include cases related to Modern Slavery. Furthermore, SHG Board receive an annual Safeguarding Report providing a summary of activity which would also highlight any specific Modern Slavery issues. There have been no reported Modern Slavery cases within SHG.

Regular contract management meetings allow for relationships to be developed with suppliers, meaning any risks / red flags that may be an indication of a modern slavery or human trafficking concern can be picked up and escalated within the business. This is an ongoing process with any issues being escalated to management if they were to arise.

5. Measures of effectiveness of steps being taken

SHG ensures that all suppliers who tender for opportunities with the company:

- Are committed to the ethos of the Modern Slavery Act 2015.
- Can demonstrate their own commitment to tackling modern slavery.
- Have a valid and robust Equality, Diversity and Inclusion Policy.
- Have a valid and robust Health and Safety Policy.
- Pay Minimum Wage (and preferably Real Living Wage).
- Can provide three recent, valid references for similar work / contracts.

In relation to safeguarding, SHG has a dedicated Safeguarding Lead and robust Policies and Procedures in place. SHG has over 50 colleagues across all areas of the business who are Safeguarding Champions with practical knowledge and experience of handling safeguarding issues. Staff can discuss and report any safeguarding issues to these Safeguarding Champions.

The Safeguarding Champions support staff in delivering their roles and being able to capably manage safeguarding issues. Managers and Safeguarding Champions will ensure that where concerns exist, appropriate action is taken and passed to Stockport Council / relevant agencies.

A comprehensive Learning and Development programme means staff receive relevant safeguarding training either face to face or via an e-learning platform and that content covers both safeguarding adults and children.

There are processes that capture and monitor safeguarding activity internally on key IT systems. The approach to safeguarding is periodically reviewed by SHG's internal auditors and reported to SHG Board on an annual basis. Given the multi-agency working with Stockport Council, there is a range of other reporting / audit requirements to ensure SHG continues to be an effective partner in safeguarding partnerships in the Borough.

6. Training on Modern Slavery

To ensure a high level of understanding of the risks of modern slavery and human trafficking within SHG, the Modern Slavery Statement is shared with SHG Board on an annual basis. The Modern Slavery Statement is placed on the SHG website and available to all staff via the intranet. Updates / articles of interest are shared through the intranet as required, as well as the weekly colleague newsletter and team meeting content.

There are a range of e-learning modules available on SHG's e-learning platform. This includes modules related to Modern Slavery and similar topics. Coaching is provided to staff where necessary, for example if they are involved in a tender exercise, to ensure they have the requisite knowledge around modern slavery before

embarking on a tender process. This ensures people are alert to risk indicators and know how to escalate concerns.

SHG's Procurement Team complete / attend various online training in relation to Modern Slavery, including workshops run by Crown Commercial Services (CCS) and various solicitors' practices. This information is shared where relevant with key Heads of Service / Service Managers.

A number of experienced Safeguarding Champions provide dedicated safeguarding training to colleagues across the business to ensure they are alert to the safeguarding risks facing an organisation like SHG. This training is delivered to all frontline staff within the organisation. This is supplemented by an e-learning module which office-based staff are required to complete. The training covers both safeguarding of children and adults.

SHG recognises that there is a duty of care to support all customers, particularly those that are vulnerable and where there is a risk of customers being exploited through modern slavery. Staff are trained to recognise the indicators of modern slavery when out and about in neighbourhoods via the Eyes Wide Open Policy.

The periodic Current Tenant Visits that SHG undertakes also provide an important opportunity to understand what is happening behind the front door of a property. Signs of abuse can be picked up and dealt with immediately.

SHG is part of several multi-agency safeguarding groups to ensure effective partnership working. A dedicated Officer attends regular meetings at such groups, including:

- Multi Agency Team Meetings
- Team Around the Child and Team Around the Adult meetings
- MARS (adults at risk) (Multi Agency Request for Services)
- MARAC (Multi Agency Risk Assessment Conference)

7. Ongoing Commitment

SHG are committed to ensuring as far as possible that there is no modern slavery or human trafficking in any part of our business. SHG are committed to:

- Continuing to comply with regulatory and legislative requirements.
- Developing modern slavery awareness within the organisation, supply chains and local communities.
- Ensuring suppliers demonstrate their own commitment to the Modern Slavery Act 2015 within procurement processes.
- Acting on any concerns raised in relation to modern slavery issues.



Carmel Chambers
Director of Corporate Services / Deputy Chief Executive
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