



## **Stockport Homes Group Modern Slavery Statement 2021**

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.

This statement sets out SHG's commitment to preventing slavery and human trafficking in all of its business activities and builds on actions implemented over the financial year 2020-21.

### **1. Organisation structure and supply chains**

Stockport Homes is an Arms Length Management organisation (ALMO) that manages and maintains housing stock across Stockport 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
- Foundations, the charitable company
- Viaduct, the development company.

You can find out more about Stockport Homes Group [here](#).

This Statement applies to all entities that form part of SHG.

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:

- Procure goods, services and works compliantly, securing value for money
- Treating all customers and suppliers fairly, openly and transparently

- Ensuring robust supply chains with strong contract management of suppliers

The supply chain across Stockport Homes is varied and diverse. It is managed by individual contract managers, with a group-wide Procurement Strategy in place. There are also Contract Procedure Rules that 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 when procuring goods / services / works.

## **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:

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

All of these 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 policies to ensure they remain accurate, up to date and fit for purpose. Any updates are publicised to colleagues through the intranet, weekly colleague newsletter and team meeting content.

## **3. Due diligence process**

SHG has a number of process in place to safeguard against the risk of modern slavery.

SHG has a strong set of core values that puts their customers at the heart of all they do, SHG expects all suppliers, partners and third parties they engage with to adhere to these same values to assist in preventing slavery and human trafficking.

Within all tender processes, suppliers are asked to confirm where applicable, they are compliant with the Modern Slavery Act 2015, and, if they do not have to submit a statement, that they adhere to the principles of the act in all areas of their work. This statement is verified as part of the evaluation of tenders. All suppliers are required to submit copies of their Health and Safety and Equality, Diversity and Inclusion Policies and as above. These are verified as part of the evaluation process.

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) and therefore require further investigation. SHG will challenge suppliers when a tender is received that appears to be abnormally low to investigate the reasons for this.

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.

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.

SHG has strong and robust recruitment processes. All prospective employees undergo a "Right to Work" check and have their employment history checked. Two references are taken up prior to an offer of employment being made.

Where required, employees go through a Disclosure and Barring Service (DBS) check where this is a specific requirement of their role. The People and OD Team maintain a register of roles which require a DBS and process these checks.

#### **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 senior leaders and Board Members.

Regular Contract Management Meetings allow for relationships to be nurtured with our suppliers, meaning any risks / red flags that may be an indication of a modern slavery or human trafficking concern to be picked up and escalated within the business. This is an ongoing process.

#### **5. Key Performance indicators (KPI's) to measure 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 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 Living Wage)
- Can provide three recent, valid references for similar work / contracts

Contract management meetings with suppliers provide a process for documenting concerns and action plans / evidence of effectiveness.

In relation to safeguarding, SHG has a dedicated Safeguarding Lead and robust policies and procedures in place. SHG has a number of Officers who are trained as Safeguarding Champions, to whom staff can discuss and report any safeguarding issues to.

These officers will support the member of staff and ensure that appropriate action is taken and passed to the appropriate agency.

There are processes that capture and monitor safeguarding activity internally on keys IT systems. The approach to safeguarding is periodically reviewed by SHG's internal auditors and reported to Board.

#### **In the financial year 2020 / 21:**

- 100% of tenders awarded a contracted had due diligence completed on their submission
- 59 colleagues are trained to be Safeguarding Champions
- 100% of new starters had a Right to Work check prior to starting work at SHG

- 100% of staff have a DBS check completed prior to starting work at SHG (where necessary)
- 344 colleagues have completed online safeguarding training (to date).

## **6. Training on Modern Slavery**

SHG rolls out online training to all staff regarding modern slavery through the online training provider. The Modern Slavery Statement is available to all staff via the intranet and updates / articles of interest are shared through this platform, as well as the weekly colleague newsletter and team meeting content.

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 the Board on an annual basis.

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.

The SHG Procurement Officer has attended various online training in relation to Modern Slavery, including workshops run by CCS and solicitors' practices. This information is shared where relevant with key Heads of Service / budget managers.

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 our neighbourhoods via the Eyes Wide Open Policy.

SHG also attends a number of safeguarding group meetings to ensure effective partnership working, including:

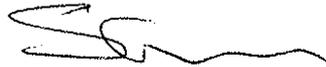
- Multi Agency Team Meetings
- Team Around the Child and Team Around the Adult meetings
- MARS (adults at risk) (Multi Agency Request for Services)
- MARAC (Multi Agency Risk Assessment Conference)

All staff attend Safeguarding Training as part of their induction. This is delivered at different levels of detail depending on the role undertaken by the member of staff.

## **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:

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



Sandra Coleing

Assistant Chief Executive

31 August 2021