



## **Stockport Homes Group Modern Slavery Statement 2023**

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. SHG is committed to preventing slavery and human trafficking in all of its business activities.

### **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
- 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:

- Procuring goods, services and works compliantly.
- Securing value for money at all times.
- Treating all customers and suppliers fairly and transparently.
- Ensuring robust supply chains with strong contract management of suppliers.

The supply chain across SHG is varied and diverse. It is managed by individual contract managers, with a group-wide Procurement Strategy in place. There are also group-wide 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
- Value for Money Strategy
- Good Neighbourhood Management Policy
- Anti-Social Behaviour Policy
- Health & Safety Policy
- Financial Regulations and Scheme of Delegation
- Risk Management Strategy and Framework

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

## **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, partners and third parties to adhere to these same values to assist in preventing slavery and human trafficking. 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.

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.

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 a "Right to Work" check and have their employment history checked. Two recent 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, 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 senior leaders and Board Members.

Regular contract management meetings allow for relationships to be nurtured 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 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 60 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 about to capably manage safeguarding issues. Managers and Safeguarding Champions will ensure that where concerns exist, appropriate action is taken and passed to the 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 keys IT systems. The approach to safeguarding is periodically reviewed by SHG's internal auditors and reported to Board.

All new starters undergo a Right to Work check as part of the job offer process and where required for the role, a DBS<sup>1</sup> check is undertaken prior to the employee starting work at SHG.

## **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 the Board on an annual basis.

This 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.

There are a range of e-learning modules available on the e-learning platform: Litmos. 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.

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<sup>1</sup> Disclosure and Barring Service

The SHG Procurement Officer has attended 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 / budget managers.

The 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 / vulnerable people.

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. 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, Executive Director of Resources  
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