

# Slavery and Human Trafficking Statement

## 1. Introduction

In October 2015 the Modern Slavery Act came into force. The Act requires all organisations with a turnover of more than £36M to publish a statement which sets out the organisation's actions to understand and address all potential slavery and human trafficking risks within their business and supply chain. This statement sets out Thames Valley Housing's position at 31 March 2016.

We are committed to preventing slavery and human trafficking in our operations, and we confirm that, to the best of our knowledge, there is no slavery or human trafficking within our business or supply chain.

## 2. Organisational structure and supply chains

Thames Valley Housing Association is the parent company of the Group which includes Thames Valley Charitable Housing Association, Opal Land LLP, Fizzy Services Management and Evolution Woking. The Group operates within the social, affordable, private sale and private rent housing sectors. Thames Valley Housing and its subsidiary, Thames Valley Charitable Housing Association are Community Benefit Societies and are Registered Providers of housing regulated by the Homes & Communities Agency. Thames Valley Housing develops, owns and manages some 15,000 properties within London and the south east of England. It employs approximately 250 staff and for the year ended 31<sup>st</sup> March 2016 had a turnover of £104M.

The Group contracts out the development and construction of its properties, estate cleaning, gardening and maintenance services. The Group's head office is located in Twickenham, Middlesex. The Group's supply chain includes contractors who carry out these services, professional advisors and corporate services providers.

The Group operates solely within the UK and considers that its activities are low risk in terms of slavery or human trafficking. Thames Valley Housing meets or exceeds all statutory requirements relating to staff employment. It is committed to dignity at work and to the fair treatment of all staff.

## 3. Due Diligence

Some activities carried out within our supply chain, such as construction, cleaning, gardening and maintenance and the provision of temporary staff are exposed to higher risks in terms of slavery or human trafficking. To address this Thames Valley Housing is strengthening its procurement procedures.

The Group's current tendering processes follow best practice within the sector and when seeking new contractors will include the requirement for bidders to provide their Slavery and Human Trafficking Statement. During the next 12 months Thames Valley Housing will ask its current contractors to provide a copy of their Slavery and Human Trafficking Statement.

Thames Valley Housing uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Thames Valley Housing's recruitment and selection policy includes provisions addressing modern slavery and human trafficking.

Thames Valley Housing's corporate policies are reviewed every 3 years. All Policies are approved by the Executive Group or the Board. The main corporate policies which incorporate the identification and approach to slavery and human trafficking are the Whistleblowing Policy and Code of Conduct and these will be reviewed during the current financial year.

The Whistleblowing policy encourages all of its employees, residents, contractors and other stakeholders to report any concerns related to the direct activities, or the supply chains, of Thames Valley Housing. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Thames Valley Housing's whistleblowing procedure is designed to make it easy for staff to make disclosures, without fear of retaliation. Employees, residents or other stakeholders who have concerns can make use of the policy, which is available upon request.

Thames Valley Housing's Code of conduct makes clear to staff the actions and behaviour expected of them when representing the organisation. Thames Valley Housing seeks to maintain the highest standards of employee conduct and ethical behaviour both when liaising internally and with its customers and stakeholders and when managing its supply chain. The staff code of conduct is available upon request.

#### **4. Training and Awareness**

New staff have an induction programme, which now includes a session on how to identify slavery and human trafficking and what to do.

A short course covering understanding and identifying slavery and human trafficking is to be included in the new Training Programme targeted at front line staff.

The Modern Slavery Act will be covered at a Staff Briefing in late 2016 followed by a series of blogs explaining how employees can identify and prevent slavery and human trafficking, how to flag potential issues and what external help is available.

Staff are required to certify that they have read and understood core corporate policies, and this certification will include this slavery and human trafficking statement in 2017.

This statement is made pursuant to S54 of the Modern Slavery Act 2015 and constitutes our Slavery & Human Trafficking Statement for the year ended 31<sup>st</sup> March 2016.



**Geeta Nanda, Chief Executive**