



Stockport Homes Group Modern Slavery Statement 2019

The Modern Slavery Act (MSA) came into force in October 2015. It aims to eradicate modern slavery, which encompasses human trafficking, slavery, forced labour and servitude.

Stockport Homes supports the principle of the Act in eradicating modern slavery, and ensures that in achieving its own mission statement of “one team, transforming lives”, that it has robust and strong procedures and policies (as detailed below) to mitigate the risk of modern slavery in the organisation and supply chain. This commitment applies to all entities that form part of the Stockport Homes Group.

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

This statement sets out Stockport Homes Group’s commitment to preventing slavery and human trafficking in all its business activities. The statement focuses on two key areas: procurement and our supply chains and the wider organisation and the role our staff can play in eradicating modern slavery.

1. Structure and Supply Chains

Procurement:

Stockport Homes Group has a wide range of suppliers who provide goods, services and works across the Group. We are committed to continuously improving our practises in the procurement of our suppliers to ensure they reflect both legislative requirements and best practice.

We utilise the Government’s Standard Supplier Questionnaire (SQ) to allow us to verify new suppliers’ capabilities. This is reviewed as a desktop exercise. We carry out more in depth checks on suppliers who are to be awarded contracts, including financial checks and in some instances site visits. We also take up references to verify the information provided by a supplier in a tender process. We will reject suppliers that do not meet the minimum standards.

Where we carry out site visits, staff are provided with the means to report any concerns noted during these visits through the policies detailed in the section below.

Where suppliers are working with Stockport Homes Group delivering construction works, they are expected to hold silver level with ConstructionLine to ensure they can demonstrate specific requirements have been met.

2. Policies on Modern Slavery

We are dedicated to maintaining the highest standards of conduct from our employees and suppliers, and ensuring there are processes for staff to raise concerns should a need arise.

A number of policies are in place that contribute to our overall approach to modern slavery, these are summarised below:

Procurement:

Contract Procedure Rules:

An internal document that gives direction on how Procuring Managers should go about procuring works, goods and services through suppliers, ensuring suppliers are competent and compliant and due diligence is undertaken in all procurement activity.

Organisational:

Eyes Wide Open:

A statement that describes the organisation's approach to taking responsibility when identifying issues in Stockport Homes' neighbourhoods. This policy encourages staff to be aware of situations and sets out the process to report any concerns.

Safeguarding Children and Adults at Risk:

This policy sets out Stockport Homes' commitment to supporting and working in partnership to ensure the safeguarding of children and adults at risk. This policy links to a wide range of legislative requirements.

Whistleblowing:

A policy that sets out clear ways in which individuals can raise concerns they have on any fraud, misconduct or wrongdoing within the organisation and how these concerns will be dealt with promptly and thoroughly.

All of these policies are brought to the attention of staff at induction and are available on the intranet at all times. Periodic reviews are undertaken of these policies to ensure they remain accurate and fit for purpose.

3. Due Diligence Process

SHG has a number of processes in place to provide reassurance and safeguard against the threat of modern slavery.

Procurement:

Suppliers must agree to and then sign a copy of our Standard Terms and Conditions in order to work with us. They are also required to provide copies of their Health and Safety and Equality and Diversity Policies. If they are required to write a Modern Slavery Statement, we will check this statement on their website.

We have processes in place to challenge abnormally low tenders received, which could be deemed to be an indicator of a breach in labour law (e.g. not paying wages correctly).

We will complete factory and site visits if the risk of modern slavery is deemed higher. We will judge this requirement on a case by case basis.

We ask suppliers to declare upfront if they intend to use subcontractors, and if suppliers do so they are required to provide evidence of how they have recruited the subcontractors and that they have due diligence completed. This provides us with the necessary assurance over the use of subcontractors. The Standard Terms and Conditions that suppliers agree to prevent them from issuing work to subcontractors without our prior agreement.

Suppliers, once awarded a contract, will be required to take part in regular contract management meetings as part of our ongoing contract management / due diligence process.

Organisational:

Staffing:

We have standard recruitment checks when recruiting new staff into our organisation. All of our staff undergo a “right to work” check. Where required, staff go through a DBS Check where this is a specific requirement of their role. HR maintain a register of roles which require a DBS.

Tenants:

SHG recognises that we have a duty of care to support all tenants, 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 (for more detail on training see below). We also attend a number of safeguarding groups:

- Multiagency Team Meetings
- MARS (adults at risk) (Multi Agency Request for Services)
- MARAC (Multi Agency Risk Assessment Conference)

In addition to these wider partnership meetings, internally we complete:

- New tenant visits (this is completed in the first six weeks of a tenancy starting)
- Tenant visits on a cyclical programme (these are visits to meet customers at their home to verify tenancy details and identify any issues)
- We offer support services for vulnerable people who may be at risk (there are a range of services available to customer including tenancy support and positive engagement work)
- Winter welfare visits (SHG visits elderly customers to ensure they are safe and well over winter)

All of these provide opportunities for our staff to see vulnerable individuals in their home environment and note any indicators, allowing them to report these accordingly as detailed above.

SHG also has a Housing Fraud Officer who is available to investigate any fraud concerns, which is another route to potentially identifying wider concerns / issues.

Risk Assessment

Stockport Homes Group 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. These registers are monitored on a quarterly basis and report to senior leaders and Board Members.

Measuring Effectiveness

Stockport Homes Group recognises the importance of measuring the effectiveness of the interventions in place and this is done in the following ways:

Procurement:

By reviewing responses to the Supplier Questionnaire, the Procurement Officer is able to review aspects relating to modern slavery and any associated published statements.

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

ConstructionLine is utilised by our construction contractors as a means of ensuring compliance. The Procurement Officer receives notification if a supplier drops below the minimum threshold for compliance, and alerts the relevant team. Action would be taken to assess and address the risk associated with that contract.

Organisational:

We have a dedicated safeguarding lead within Stockport Homes Group. We have processes that capture and monitor safeguarding activity internally. This information is captured on our CRM system.

Minutes of meetings (internally and partnership), also provide a medium for monitoring effectiveness.

HR maintain records of training individual staff members have attended.

Training for Staff

Procurement:

All procuring managers have available to them an in house Procurement Training Course, within which modern slavery is covered. Staff are advised of the process in which to follow if they suspect modern slavery within the supply chain.

The Procurement Officer works in a business partnering approach and would raise issues around modern slavery when providing advice, guidance and coaching to managers when undertaking procurement activity.

Organisational:

All staff have access to an online learning module regarding modern slavery. Details of which are circulated periodically to encourage staff to complete.

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.

The Procurement Officer and the Customer Services Manager for Housing Services attended a Greater Manchester Modern Slavery Awareness “Train the Trainer” Session in July 2018, in order to develop in-house training for Stockport Homes Staff. As a result of this the adult safeguarding training now includes content relating to modern slavery and highlights the referral process.

Looking Ahead

Over the course of the next financial year we will continue to enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery.

Procurement:

We will update our Procurement Strategy in 2019, ensuring this reflects our responsibility to modern slavery. We will also review our Contract Procedure Rules to ensure they remain fit for purpose and reflect best practice.

Particular attention will be paid to the role contract management has to play in awareness of modern slavery and measuring its effectiveness.

The above will all be supported through the use of the new Procurement Portal; Pro Contract, allowing for more efficient and robust processes in procurement as well as a valuable reporting tool.

Organisational:

We are looking at the feasibility of rolling out specific modern slavery training to staff. Work will be undertaken in this regard across 2019.

We are continuously reviewing the parent and subsidiary companies within Stockport Homes Group to ensure each company is aware of the risks in their specific sectors and if necessary adopts their own Modern Slavery Statement.

We will also consider a range of KPIs on relevant contracts to measure the effectiveness.

Approved by:

Sandra Coleing, Assistant Chief Executive, Stockport Homes Group

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