

Modern slavery statement for financial year 1st April 2018 – 31st March 19

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that emh group (consisting of emh group, emh homes, emh care & support, emh sharpes and Midlands Rural Housing) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Emh group has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically, with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

The Association is a Registered Provider of social housing managing around 19,000 properties and was formed for the benefit of the community. Its objects are to carry on for the benefit of the community:

1. The business of providing housing, accommodation, and assistance to help house people and associated facilities and amenities.
2. Any other object that can be carried out by a Registered Provider registered as a social landlord with the Regulator of Social Housing.

We have around 1,200 suppliers across the Group.

Risk Assessment and Due Diligence

As we are based solely in the UK we consider no areas of our business to be of high risk. Following a research based risk assessment focussing on factors such as levels of staff turnover, procurement controls, outsourcing arrangements and levels of unskilled work, the area of greatest (although moderate) risk is construction, cleaning and care provision via agencies.

As part of our initiative to identify and mitigate risk we have in place systems to:

- identify and assess potential risk areas in our supply chains;
- mitigate the risk of slavery and human trafficking occurring in our supply chains;
- monitor potential risk areas in our supply chains; and
- protect whistle blowers.

Any risks are mitigated through our framework of policies and procedures and our procurement process.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help. *(insert link to policy)*
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees to act.

Our suppliers

Emh group operates a supplier policy and undertakes due diligence on all suppliers that are procured through the Public Contract Regulations 2015. This due diligence includes an online statement that each supplier is required to complete to show that the organisation has never been convicted of offences relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light

Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Further Steps

Continue to work with our existing contractors and partners to address any concerns relating to Modern Slavery

- Continue to raise awareness with our staff and customers about Modern Slavery and how they should respond to any concerns
- Raise awareness amongst housing staff of the risks relating to our properties being used to support any forms of modern slavery, and how to address any such concerns
- Develop a plan to carry out tenancy audits on 20% of our tenants over five years to achieve 100%. Our focus is around vulnerable people and ensuring we are picking up issues proactively

Approval for this statement

This statement was approved by the Board of Directors on 21st June 2019

Name (Director) **CHAN KATARIA** Signature 

Date **21/06/2019**