

Strategy	Modern Slavery and Human Trafficking
Effective Date:	June 2017
Date Last Reviewed:	New as of June 2017
Scheduled Review Date:	April 2020
Approved by:	Board

Introduction

This statement sets out Tuntum Housing Association's proposed strategy to deliver an understanding of all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and supply chains.

The Modern Slavery Act 2015

The Modern Slavery Act 2015 consolidates various offences relating to human trafficking and slavery. In broad terms:

- 'slavery' is where ownership is exercised over a person;
- 'servitude' involves coercion to oblige a person to provide services;
- 'forced or compulsory labour' is where a person works or provides services on a non-voluntary basis under the threat of a penalty;
- 'human trafficking' involves arranging or facilitating the travel of a person with a view to exploiting them.

Section 54 of the Act requires any business that has a global turnover of £36m or more in the UK should produce and publish an annual slavery and trafficking statement in a "prominent" place on its website every year.

However, because our turnover is considerably less than £36m we will not be publishing an annual slavery and trafficking statement. Nevertheless this strategy sets out what steps we will take to ensure there is no slavery in any part of its business, including our supply chains.

Our Pledge

As a Registered Social Landlord, we recognise our duty to combat modern slavery and human trafficking. We are committed to improving our practices to combat modern slavery and human trafficking in our corporate activities and supply chains.

How we will deliver our Pledge

Supply Chains

We will review the areas where there are risks of modern slavery and human trafficking and view these as follows:

- Supply chains linked to the house building and property maintenance as a result of the organisations' reliance upon external contractors to undertake a high percentage of the organisations building and maintenance work.
- Supply chains in the provision of occasional agency staff predominantly in adult social care.

Inclusion in policies where appropriate:

Following training of staff and where appropriate, all relevant policies will be reviewed to include reference to this pledge. Identified relevant properties include the following:

- Whistle Blowing
- Staff Recruitment with reference to Agency Staff
- Employee Code of Conduct
- Procurement
- Safeguarding
- Maintenance with reference to procurement
- Financial Regulations
- Operational Risk Registers
- Allocations Policy

Investigations

In the interim and up to when all policies are reviewed, individual Senior Managers with assistance from the Human Resources consultant will be responsible for investigating any suspected instances of modern slavery.

Any suspected incidence of modern slavery would be immediately reported to the Director of Business Development in the first instance who would consult with our HR Advisers and following this it would then be dealt with appropriately.

.Training and Awareness

We will arrange for awareness training to be delivered to appropriate employees which will cover the following:

- The basic principles of the Modern Slavery Act 2015;
- How employers can identify and prevent slavery and human trafficking;
- What employees can do to flag up potential slavery or human trafficking issues;
- What external help is available, for example through the Modern Slavery Helpline;
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies;
- What steps should be taken if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.



Inclusion in Operational Risk Assessments where appropriate:

All operational risk registers are considered by the Risk Assessment Panel (RAP) on at least a quarterly basis. When appropriate and following training of relevant staff, these risk registers will be amended to include reference to modern slavery.

Proposed Actions for 2017/18

- Requiring all relevant staff to have completed training as above on modern slavery by April 2018. This can include the Governments videos on Modern Slavery.
- Reviewing all relevant policies to ensure that they comply with good practice and legal requirements. During 2018/19.
- Reviewing existing supplier and contractor list to include an evaluation of all existing suppliers and contractors for their compliance with the Modern Slavery and Human Trafficking Act by April 2018.
- To require all suppliers and contractors to make a statement to TUNTUM that they comply fully with the requirements of the Modern Slavery and Human Trafficking legislation irrespective of whether they are required by legislation to publish a statement by December 2017.
- To offer e-learning package on modern slavery free of charge to our smaller contractors.