



# Modern Slavery & Human Trafficking Policy & Procedure

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## Introduction

This Modern Slavery and Human Trafficking policy is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 1<sup>st</sup> April 2021.

Empower Housing Association ('the company', 'we' 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain and its products. We have zero tolerance towards slavery and require our supply chain to comply with our values.

## Organisational Structure

Empower Housing Association has business operations in the United Kingdom.

We operate in the supported living sector. The nature of our supply chain is as follows: Building Contractors and Care Providers.

For more information about the Company, please visit our website: <https://empowerhousing.org.uk>.

## Policies

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

These include the following:

- **Recruitment & Selection Policy**

We conduct checks on all prospective employees to verify they are eligible to work in the UK. Certain roles requires a Disclosure and Barring Service (DBS) check where employees may be working with vulnerable people.

- **Staff Code of Conduct**

We are committed to the fair treatment of all staff. Our staff code of conduct reflects our core values and expected behaviours. The code of conduct makes it clear that we have a zero-tolerance approach to modern slavery.

- **Procurement Policy**

We want to make sure that potential suppliers are committed to ensuring that slavery and human trafficking is not taking place within their own supply chains. Our procurement policy and supporting procedures set out controls and checks undertaken to help verify this.

- **Safeguarding Policy**

This policy highlights the potential risks of modern slavery and human trafficking, including how to identify signs of exploitation and how to report concerns.

- **Contractor Competency**

We want to make sure that potential contractors are committed to ensuring that slavery and human trafficking is not taking place within their own supply chains. Our Procurement Policy and supporting procedures set out controls and checks undertaken to help verify this.

We make sure our suppliers are aware of our policies and adhere to the same standards.

## **Due Diligence**

As part of our efforts to monitor and reduce risk of slavery and human trafficking occurring in our supply chain, we have adopted the following due diligence procedures:

- Internal supplier audits

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business supply chains

## **Risk and Compliance**

The Company have evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier
- Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping

We do not consider that we operate in a high-risk environment because:

The majority of our supply chain is based in the UK and in low-risk industries, such as building development, maintenance and IT services.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will require that supplier to remedy the non-compliance.

## Effectiveness

The Company use Key Performance Indicators (KPI's) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPI's are as follows:

- We will carry out regular audit of suppliers – 25% of suppliers each year.

The statement was approved by the board of directors.