

SAXON WEALD



Anti-Slavery and Human Trafficking Statement 2020-21

First Approved: September 2017

Author: Jim Dean

Last Revision: May 2020

Next Review: May 2021

1.0 Introduction and aim

- 1.1 The Modern Slavery Act 2015 (transparency in supply chains) came into force on 29 October 2015. Its aim is to reduce and prevent slavery, servitude, forced or compulsory labour and human trafficking in the UK.
- 1.2 The Act requires commercial organisations (both listed and private), operating in the UK and with a turnover of £36 million or more, to publish and make available (on their websites) an Anti-Slavery and Human Trafficking Statement.
- 1.3 The Statement must be reviewed annually by the Board and cover the whole financial year. It must set out the steps taken by Saxon Weald to ensure that its business and supply chains are slavery free.
- 1.4 The aim of this Statement is to provide assurance that Saxon Weald is compliant with the Modern Slavery Act 2015 in its employment, procurement and housing management practices.

2.0 About Saxon Weald

- 2.1 Established in 2000, Saxon Weald is a housing association managing over 6500 homes across Sussex and Hampshire. We provide affordable rented and shared ownership homes for individuals and families, as well as properties exclusively for the over 55s. We also provide homes for market rent and outright sale through our Weald Living brand.
- 2.2 Saxon Weald is a charitable Community Benefit Society, regulated by the Homes and Communities Agency. We are a not-for-profit company, with all income from rents being re-invested in the management, maintenance and building of homes.

3.0 Definition

- 3.1 Saxon Weald defines modern slavery as: *Conduct that constitutes the offences of forced or compulsory labour and the unlawful trafficking of adults and/or children for illegal and/or immoral purposes.*

4.0 Modern Slavery Statement

Policy

- 4.1 Saxon Weald is committed to ensuring that it complies with its legal responsibilities under the Modern Slavery Act 2015. Our aim is to ensure that slavery and human trafficking do not exist in any aspect of our business or supply chain; as well as to demonstrate ethical practices that align with our corporate values and charitable status. To meet this commitment, Saxon Weald will:
- i. Ensure that all reports and allegations of modern slavery are recorded, investigated and responded to quickly, confidentially and sensitively; involving the police and other relevant agencies and authorities as necessary.
 - ii. Promote and make accessible a whistle-blowing policy and procedure, which enables staff, residents and anyone working on our behalf to confidentially report concerns relating to modern slavery or human trafficking that may be occurring in our organisation, in any of our properties or in our supply chain.
 - iii. Assign a senior member of staff to be responsible for ensuring that the commitments made in this Statement are achieved and that Saxon Weald remains compliant with the Modern Slavery Act 2015.
 - iv. Raise awareness of our approach to Modern Slavery by publishing our Statement in a prominent place on our website; as well as on those of the TISC Report Modern Slavery Act Compliance Tracker and Modern Slavery Registry

Employment and Training

- 4.2 As a responsible and ethical employer, Saxon Weald will:
- i. Require all prospective employees to provide suitable documentation, which evidences their true identity and verifies their entitlement to live and work legally in the UK.
 - ii. As a minimum, pay our staff the appropriate national living wage and ensure that their terms and conditions of employment are clear, fair, reasonable and compliant with all relevant legislation.
 - iii. Provide training on modern slavery and human trafficking to relevant staff, in order to raise awareness of how to recognise and report it, along with its implications on our business and the people affected.

Property Lettings and Management (due diligence)

- 4.3 We will reduce the risk of our properties being used to support and accommodate modern slavery by:
- i. Requiring all persons applying for retirement housing via our internal waiting list, as well as those applying directly for our private rent accommodation or difficult to let properties, to provide suitable documentation, which evidences their true identity and verifies their entitlement to live legally in the UK, in accordance with Right to Rent legislation.

- ii. Actively encouraging our residents to report any unusual activities which suggest that modern slavery may be occurring in our homes or neighbourhoods.
- iii. Ensuring that our staff are proactive and vigilant in recognising signs of modern slavery; taking appropriate action to investigate and address any potential issues that raise their concerns. This will include informing the relevant agencies and, if necessary, taking legal action to regain possession of a property, where it is suspected and/or evident that a serious breach of tenancy has occurred relating to modern slavery.

Supply chains (due diligence)

- 4.4 In outsourcing works, services and supply arrangements to external organisations, Saxon Weald expects the organisations we do business with to share its commitment to preventing and eliminating modern slavery and human trafficking. To help enforce and monitor this, we will:
- i. Prior to entering into business arrangements, require all organisations with an annual turnover of more than £36 million that provide goods, services or works to Saxon Weald, to provide us with an up-to-date copy of their Anti-Slavery and Human Trafficking Statement. Following which, we will expect them to update their Statement annually and make it available to us on request.
 - ii. Require all new and prospective suppliers and contractors to declare that they, and to the best of their knowledge their supply chains, are not involved in any activities that could be considered “modern slavery”, as determined by the Modern Slavery Act 2015. As well as to confirm that they and their suppliers, have not been subject to, or pending, an investigation in connection with allegations involving modern slavery or human trafficking.
 - iii. Only trade with organisations that fully comply with the requirements of this Statement or who are taking verifiable steps to do so.
- 4.5 We will take the turnover of any subsidiaries into account when assessing whether or not a commercial organisation’s turnover exceeds the £36million threshold. Where a commercial organisation is made up of subsidiaries, we will accept the Anti-Slavery and Human Trafficking Statement of the parent company, provided that it covers the steps being taken to comply with the MSA in the relevant financial year, by both itself and the subsidiary tendering for our work.

Risk assessment and management:


- 4.7 We will identify potential areas of modern slavery risk in our corporate risk map, along with the controls in place to prevent and mitigate them.
- 4.8 Our due diligence practices will help ensure that any concerns of modern slavery are identified, challenged and addressed prior to letting our properties or entering into supply arrangements.
- 4.9 We will act quickly and take appropriate action where it is apparent that a supplier or contractor has been associated with activities that constitute slavery or human trafficking. This may include removing them from our approved list.

Monitoring effectiveness

- 4.10 All senior managers will be required to annually complete a modern slavery compliance statement, which provides assurance that no modern slavery concerns exist in their business area. It will also require them to identify any concerns of non-compliance, along with their plans to address them.
- 4.11 The Board of Saxon Weald will receive an annual report that provides assurance of our compliance with the Modern Slavery Act 2015 and identifies any changes that need to be made to this Statement or our anti-slavery practices.

5.0 Annual review of this Statement

- 5.1 This Statement has been approved by Saxon Weald’s Board. It is made in accordance with section 54(1) of the Modern Slavery Act 2015 for the financial year ending 31 March 2020.
- 5.2 This Statement will be reviewed and approved by the Board annually in May, or before if necessary. It will be updated as appropriate to reflect any changes to our practices. The annual review will include a report that updates the Board on our progress on delivering the commitments made and provide assurance of our continued compliance with the Modern Slavery Act 2015.

Signed for and on behalf of Saxon Weald: 		
Name: Steven Dennis	Position: Chief Executive	Date: 24/05/2020

Version Control

Version	Amendment	By	Date
1	<p>i) 4.2.2 has been amended to specify who will be subject to Right to Rent checks.</p> <p>ii) 4.3.3. has been added to enable us to exclude organisations tendering for our business that are unable to evidence their compliance with the requirements of the Modern Slavery Act from the tender process.</p> <p>iii) 4.4 has been added to clarify our requirements in relation to working with subsidiaries of group structures with a turnover in excess of the £36million threshold.</p>	Jim Dean	September 2018
2	<p>The Statement was fully revised and updated in April 2019 (approved by Board on 20 May 2019). This was to ensure that future annual reviews are carried out within six months of our financial year end, as required by the Modern Slavery Act 2015.</p> <p>The Statement has been restructured to highlight the areas recommended for inclusion in the statutory guidance issued by the Home Office.</p> <p>4.1(iv) has been added to identify how we will share and raise awareness of our approach to modern slavery. Our updated Statement will be published on the TISCSReport Modern Slavery Act Compliance Tracker and Modern Slavery Registry websites once it has been approved by the Board at its meeting on 20/05/2019.</p> <p>4.3 (ii) has been included in relation to our staff being proactive and vigilant in recognising and responding to signs of modern slavery.</p> <p>4.10 has been added to identify how senior managers verify compliance in their business areas, which is used to inform the annual Modern Slavery Compliance Assurance Report to the Board.</p>	Jim Dean	April 2019
3	<p>4.3 (iii) amended final sentence to include that we will also inform the relevant agencies where it is suspected and/or evident that a breach of tenancy has occurred relating to modern slavery.</p>	Jim Dean	May 2020