

Modern Slavery and Human Trafficking Statement

Introduction and Commitment from the Board

Hastoe is fully opposed to, and committed to preventing, modern slavery and human trafficking within our organisation and throughout our supply chains.

We have put in place, and regularly review, a Modern Slavery and Human Trafficking Policy to demonstrate our commitment to acting ethically and with the highest standards of integrity in all our business dealings and relationships.

We are committed to developing, implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere within our business or in our supply chains.

We will never knowingly deal with any business involved in slavery or human trafficking.

Purpose and scope of this statement

This statement is made on a voluntary basis with reference to section 54(1) of the Modern Slavery Act 2015. It relates to the financial year April 2019 to March 2020. It applies to all legal entities that form part of the Hastoe Group.

This statement sets out the steps we have already taken and intend to take, to minimise the risk of modern slavery and human trafficking in our business activities and within our supply chain.

Organisational structure and business function

Hastoe Housing Association is registered with the Financial Conduct Authority as an exempt charity, and is registered with the Homes and Communities Agency as a social housing provider.

Hastoe is the leading rural housing provider in England. We own and manage over 7,000 properties across 71 local authority areas in the south of the country, and employ around 115 staff. Our main business is providing housing to people with a general housing need at social and affordable rents. We re-invest our operating surplus into new and existing homes and improving our services for the benefit of our customers and their communities.

Areas of Risk – Our Business

We estimate the risk of slavery and human trafficking occurring within our own business as being low. Hastoe has robust policies and procedures in place for carrying out background and identity checks on all new employees. We ensure that all staff are eligible to work in the UK and we only pay salaries directly into employees' personal bank accounts. We pay our interns in line with the rates published by the Living Wage Foundation.

Areas of Risk - Our Properties

We estimate the risk of using a Hastoe property for any criminal, immoral, anti-social or illegal purpose as being low. Any of these activities is a breach of the tenancy agreement. We carry out tenancy audits on our properties, including identification checks, to ensure the correct people are living there. We have appropriate mechanisms to end the tenancy agreement where breaches have occurred.

We have also implemented a Safeguarding Policy and Procedure with appropriate Safeguarding training for relevant employees.

Areas of Risk - Our Supply Chain

Hastoe has a Procurement Policy and Procedure and maintains a preferred supplier list. We conduct due diligence checks on all our suppliers before allowing them to become a preferred supplier.

We have begun the process of mapping our supply chain so that we can assess the risks in our sector and geographical areas, particularly in construction and property maintenance which are areas associated with the exploitation of vulnerable migrants; and IT products where it is recognised that forced labour is high risk throughout developing countries.

Actions - Procurement and Supply Chain

- We have incorporated the compliance requirements of the Modern Slavery Act 2015 by reviewing our standard contract terms for procurement to ensure that potential suppliers are aware of Hastoe's position on slavery issues. This includes mechanisms for terminating contracts where involvement in slavery or human trafficking has been discovered.
- We require new suppliers to complete our targeted due diligence questionnaire to confirm that they are not involved in slavery or human trafficking, and that they are fully compliant with the Modern Slavery Act 2015.
- We aim to review our existing supplier and contractor list by 31 March 2020 to ensure suppliers and contractors are taking appropriate steps to minimise slavery and human trafficking.
- We will take prompt action where a compliance breach has been identified and work with the supplier to minimise the risk of this recurring, or terminate the contract.

Actions – Our Business

- We raise employee awareness about modern slavery issues through our intranet and encourage them to report concerns and ensure that these are acted upon.
- We will deliver training to all employees so that everyone understands the signs of modern slavery and human trafficking, and knows what to do if they suspect it is taking place within the workplace, in our homes or within our supply chain.
- We will keep under review our approach to recruiting agency workers and only work with employment agencies that are compliant with the Modern Slavery Act 2015 and this statement.
- We will take appropriate tenancy enforcement action where cases of slavery and human trafficking are identified within our homes.
- We will continue to review and update relevant internal policies, procedures and practices, taking effective and proportionate steps to ensure there is no slavery or human trafficking in our business.
- We will continue to build on our approach to modern slavery and human trafficking and annually update this statement to reflect the best practice possible in these evolving changes.

Working Practices

The following existing policies and procedures contribute to preventing modern slavery and human trafficking:

- Anti-Fraud Policy
- Anti-Money Laundering Procedure
- Code of Conduct
- Maintaining Standards of Probity
- Procurement Policy and Procedure
- Recruitment Policy and Procedure
- Safeguarding Policy and Procedure

- Whistle Blowing Policy and Procedure

Performance Indicators

We will know the effectiveness of the steps we are taking to ensure that modern slavery and/or human trafficking is not taking place within our business or supply chain, if:

- We receive no reports from employees, residents, the public, or legal or government agencies, to indicate that modern slavery or human trafficking practices have been identified.

Approval

This statement was approved by the Hastoe Board on 20 June 2019 and will be reviewed annually.

Signed

E.Buscall

Ed Buscall
Chair, Hastoe Board