

# 2018/19 Modern Slavery Statement

This statement sets out Accent Group's commitment to preventing slavery and human trafficking in all its business activities and within its supply chains. It outlines the steps we have taken to ensure compliance with the Modern Slavery Act 2015 (MSA).

## **Organisational structure**

Accent Group is a national social housing provider, owning and managing circa 21,000 homes in England.

Accent Group Limited (AGL), our group parent, is a charitable registered society under the Co-operative and Community Benefit Societies Act 2014. It is also a registered provider of social housing with the Regulator of Social Housing. Within our group structure there are a number of subsidiaries including Accent Corporate Services Limited and Accent Housing Limited (AHL).

Whilst our modern slavery statement applies to the whole Group, and all parts of the Group are expected to minimise the risks of slavery and human trafficking in their business supply chains, AHL is the only subsidiary with sufficient turnover to require formal coverage by this statement. We have taken steps to satisfy ourselves that the supply chain for AHL is satisfactory in terms of meeting the requirements of the MSA, and also meeting any formal requirements that we set out for our suppliers.

## **Compliance responsibility**

Responsibility for compliance with the MSA rests at the highest level with our Board of Management, with compliance responsibility assigned to the Head of Regulation and Assurance.

Our staff code of conduct makes it clear that preventing, detecting and reporting concerns about modern slavery, in our business and in our supply chain, is the responsibility of everyone who works for us is

## **Our 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 policy

We operate a robust recruitment policy which includes conducting checks on all prospective employees to verify that they are eligible to work in the UK. Certain roles also require a DBS (Disclosure and Barring Service) check where employees may be working with vulnerable people.

In 2019, we created an in-house recruitment role to provide greater focus and co-ordination of recruitment activities across the organisation.

### Whistleblowing policy

We operate a whistleblowing policy so that all employees know that they can raise legitimate concerns about how colleagues are being treated, or practices within our business or our supply chain, without fear of reprisal.

### Safeguarding policy

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

### Staff code of conduct

We are clear that Accent Group is committed to dignity at work and fair treatment of all colleagues. Our staff code of conduct provides colleagues with the necessary guidance to carry out their work in the right way and 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 expect our suppliers to have the same high standards as we impose on our own business operations. Our procurement policy and supporting procedures contain checks and controls designed to help us verify that any potential suppliers that are subject to the MSA are committed to making sure that slavery and human trafficking is not taking place within their own supply chain.

### **Risk assessment**

We carry out an annual review of our approved supplier list to determine whether any suppliers carry a greater degree of risk due to the type of goods or services they provide or due to their geographical location. Our supply chain consists mainly of services and supplies for our planned maintenance programmes, with the highest risk areas being associated within our building and maintenance activity. We do not have any supply chain outside the United Kingdom.

We operate a centralised supply chain using a 'purchase to pay' system which requires the use of pre-approved suppliers. This means that there are more rigorous controls in place prior to committing to expenditure and improved visibility for retrospective checks on expenditure.

### **Due diligence**

We carry out due diligence on all new suppliers before allowing them to become an approved supplier:

- All new suppliers are required to declare that they comply with all elements of the MSA, as far as it applies to them.
- All formal procurement carried out since 2017 has required new suppliers to confirm that they have made sufficient checks on their employees and supply

chains to ensure that there is no slavery or human trafficking taking place within their business or within their supply chain.

We include provisions in our standard terms and conditions requiring suppliers to take appropriate steps to ensure that there is no slavery or human trafficking in their supply chains. We may terminate a contract at any time should any instances of modern slavery come to light.

We carry out an annual audit of compliance with the MSA as part of our internal audit programme. We focus our assessment on high risk areas of our supply chain.

Suppliers are asked to complete a questionnaire to assess what actions they are taking to safeguard their own businesses and supply chains from the risk of modern slavery. We assess any evidence of non-compliance and will take appropriate remedial action against any supplier which does not provide adequate assurance that they comply with the provisions of the MSA.

### **Key performance indicators**

During this financial year, we have not identified any concerns that slavery and/or human trafficking may be taking place within our business or supply chain.

### **Training and awareness**

Customer facing staff undergo safeguarding training, which covers modern slavery and human trafficking. Our safeguarding policy sets out how to identify at risk groups, signs of exploitation and how to report concerns. We also raise awareness of modern slavery issues by circulating information to our colleagues around the basic principles of MSA.

We have established an employee group to create greater focus on diversity and inclusion. This year we are launching Best Companies, which will provide all colleagues with the opportunity to give feedback on practices. Our employee representative forum will coordinate the development of an action plan to address any areas of improvement.

### **Approval**

This statement was approved by the Chair of Accent Group Board on 31.10.19

Tom Miskell

Chair

Accent Group Limited