

# Modern Slavery Act 2015 and Human Trafficking Compliance Statement

## Statement of Intent

All entities within The Sovini Group are committed to promoting the highest standards of ethical business practice from our recruitment and employment activities through to the behaviours and procedural arrangements we expect from our supply chain partners.

This includes being vigilant to the human suffering caused by those involved in acts of modern slavery and human trafficking activities. We welcome the increased emphasis and need for positive action that the Modern Slavery Act brings to all the parts of our Group structure and those with whom we choose to do business.

Our aim is for continuous improvement in this area, and we will build on our existing strong emphasis on promoting employee welfare, stringent selection procedures and monitoring of our supply chain, through to our zero-tolerance stance for any form of discrimination or Human Rights breaches.

## The Sovini Group Structure and Business Activities

The Sovini Group brings together like-minded organisations from the 'non-for profit', charitable and commercial sectors in a mutually beneficial and collaborative business partnership. With the benefits of a number of shared central services, each Group entity retains independence whilst working towards commonly held codes of business practice and sound governance arrangements.

Within the Group, current business activities include the provision of homes for rent, part-ownership, outright sale and associated housing management and maintenance services. We also have businesses which deliver all aspects of property maintenance and repair, construction and land acquisition services and building materials supply both inside and outside the Group.

## Our Supply Chain Management Arrangements

Any supplier or sub-contractor that we choose to work with is subject to a comprehensive assessment process prior to their appointment, to ensure their operations are in line with our ethical business standards. This includes:

- Disbarring any company from the approved supplier list for any prosecutions or judgements for breaches of the Public Contracts Regulations 2015, Equality Act 2010, Human Rights Act 1998 or any court or industrial tribunal, including modern slavery or trafficking offences
- Ensuring companies have equality, diversity and inclusion Policies in place including employee monitoring or are willing to adopt similar policies

Once approved, suppliers and sub-contractors are subject to regular monitoring and review including internal cross-functional working, requesting staff to complete supplier performance sheets to ensure they maintain the standards required and are removed if breaches are discovered, with relevant investigation agencies informed accordingly.

In parts of our Group that are involved in importing timber products we also maintain full 'Chain of Custody' registrations to ensure the products supplied have sound environmental provenance and there are no child labour or worker exploitation issues.

## Our Organisational Response

As part of comprehensive pre-employment checks we ensure all prospective employees have indefinite leave to remain within the UK and appropriate permits to work, where these are required. This includes signposting prospective workers to European Union Settled Status requirements, where this still applies, following the UK's exit from the European Union in December 2020.

If we were to encounter any incidents where papers are not in order or there is a suspicion that the applicant may be subject to trafficking or modern slavery arrangements, we will make alerts to the relevant enforcement agencies whilst offering support to the individuals concerned.

Each company within our Group structure has in place a comprehensive suite of Human Resources Policies (copies available on request) to protect workers and ensure fair and consistent treatment during their time of employment with Sovini companies. We also maintain a comprehensive Group-wide Equality, Diversity and Inclusion Strategy which has employee welfare as one of its core themes.

All our organisational Policies are subject to an Equality Impact Assessments when they are being developed or reviewed and we will consider any implications they have in relation to the Modern Slavery Act compliance requirements.

We employ a number of 'Group Champions' to monitor our compliance arrangements and ensure we strive for continuous improvement in our response to modern slavery and trafficking issues, alongside responsibility for reporting on Corporate Social Responsibility actions.

We have developed a multi-team Equality, Diversity and Inclusion Steering Group, a staff-led diversity forum and a dedicated section of our accessible employee engagement application, all which regularly reference and raise awareness of modern slavery issues. We also provide an annually refreshed presentation to our Managers Forum on actions within our supply chain to identify potential Modern Slavery issues.

We have incorporated modern slavery and trafficking awareness into our rolling programme of 'Safeguarding Training' that is provided to all front line Sovini staff, including signs of danger and mechanisms for reporting.

Modern Day Slavery signposting details are included (telephone number and website address) under the Safeguarding information page in our Customer Relationship Management System.

We attend regional meetings which regularly use national referral mechanisms to report concerns in regard to children and adults being trafficked, particularly in regard to drug supply and child sexual exploitation.

If, during the course of day-to-day working activities, Sovini Group employees are made aware of a suspected incidence of modern slavery or human trafficking, their immediate response will be to inform the Police on 101 or as a 999 call if victims are in immediate danger. This applies equally to activities associated with other businesses that Sovini Group partners work with in community settings.

If One Vision Housing or Pine Court Housing Association tenants are involved, then our Community Safety Team would take up the case in terms of investigating / supporting / enforcement.

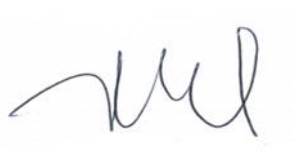
Where there are suspicions that companies / organisations Sovini Group members work with are involved in organised modern slavery or trafficking, these concerns will be forwarded on to the Group Champion (Procurement) who will coordinate a response to the National Referral Mechanism for advice and guidance.

## Planned Actions

Having already incorporated the dangers of modern slavery and trafficking into our Risk Registers, our Boards of Management will continue to receive annual progress reports on actions taken to prevent its occurrence and this information will be factored into future resource planning. The effectiveness of systems and processes will also be independently verified by inclusion on the internal audit review schedule.

To further improve our reporting and public awareness of our stance on Modern Slavery Issues, it will also be incorporated into our annual 'Environmental, Social and Governance' Report produced by the Registered Providers of Social Housing within our Group.

This Compliance Statement will be reviewed annually to remain compliant with the **Modern Slavery Act 2015** and to ensure continuous improvement across the organisation.



Signed:

Reviewed: 21/03/2023

**Roy Williams**

Group Chief Executive Officer