

Midland Heart Modern Slavery Statement 2018 -2019

1. Introduction

Midland Heart is opposed to all forms of modern slavery.

This statement sets out the actions Midland Heart has taken to combat slavery and human trafficking in our operations and supply chains for the financial year 2018-2019. It has been published in accordance with section 54(1) of the Modern Slavery Act 2015.

2. Our Organisation and Supply Chains

Midland Heart is a leading housing and regeneration social business in the Midlands. Operating across 54 local authority areas, Midland Heart owns and manages around 33,000 homes, provides services to 70,000 customers and employs 1741 staff¹. We provide high quality general needs housing, housing for older people and services aimed at preventing homelessness.

Our supply chains cover Goods, Services and Works necessary to:

- Deliver front line services to residents in the properties we manage;
- Build new homes;
- Support the “back-office” services that keep the business operating.

Responsibility for compliance with the Modern Slavery Act rests with our Main Board, with responsibility delegated to the Executive Director of Finance & Information (procurement and supply chain), Executive Director of HR & Learning and Executive Director of Operations (safeguarding and vulnerable customers).

3. Policies and Processes

We have an extensive and robust framework of policies, procedures and contractual requirements in place, which contribute to the prevention of slavery and human trafficking. Key policies include:

Governance and Control Framework - outlines the systems, processes, culture and values that provide Midland Heart with a robust structure. It ensures high quality, effective decision-making in all areas of strategy, performance, responsibility and accountability. Our commitment to prevent slavery and human trafficking is included in this document.

Whistleblowing Policy - specifically encourages Midland Heart staff, customers and other business partners to report any concerns related to the direct activities, or supply chains of the organisation, including those that may give rise to risk of slavery and human trafficking.

Code of Professional Conduct - makes clear to employees the actions and behaviours expected of them when representing the Association. Midland Heart strives to maintain the highest standards of employee conduct and ethical behaviour.

¹ Source: HR and MH intranet



Safeguarding and Wellbeing Policy & Procedure demonstrates our approach to safeguarding customers, employees and other stakeholders from abuse or neglect. We have a Safeguarding Board to oversee this.

At this stage we do not envisage specific performance indicators on modern slavery unless a high-risk is identified, which can be effectively monitored and influenced in a meaningful way.

Procurement:

Our procurement activity is governed by the Public Contracts Regulations 2015, the EC Treaty and our own Procurement Strategy.

The following steps demonstrate Midland Heart's due diligence in identifying areas of risk and the measures we have taken to manage risks posed:

- Our Procurement Pre-Qualification Questionnaire includes questions related to modern slavery and human trafficking to identify and mitigate risk in supply chains.
- Our standard Terms and Conditions require suppliers to agree to a modern slavery clause.

In 2018-19 we reviewed our **Procurement Strategy**. Alongside this we conducted a review of our existing contracts (pre-2016), which do not include a modern slavery statement. We plan to change the higher risk contracts in 2019-20 to ensure our supply chain understand our commitment to preventing modern slavery.

Contract Management:

Our **Contract Management Framework** is how we monitor and performance manage our contractors. All suppliers procured since April 2016 have confirmed their adherence to the Modern Slavery Act.

Lettings:

When letting our properties we undertake status checks, including photo ID and immigration, for potential adult occupiers, so we are confident we know who is moving into our properties.

4. Training

Since 2016 modern slavery has been part of the Safeguarding Training provided to operational staff. In 2018-19, the training was refreshed and re-launched; it is now a mandatory requirement for all staff to complete the training.

The Contract Management and Procurement training has been revised to include Modern Slavery awareness and to clarify our Contract Managers' responsibilities. The new training will commence in May 2019.

The Midland Heart Board approved this statement in March 2019 and it is signed by the accountable lead, our Executive Director of Governance & Business Planning and Company Secretary.



Modern Slavery Helpline:

You can find out more about Modern Slavery, report a suspicion or get help and advice from the [Modern Slavery Helpline website](#). They provide victims, the public, statutory agencies and businesses access to information and support on a 24/7 basis.

A handwritten signature in black ink that reads "Andrew J. Foster". The signature is written in a cursive style.

Andrew Foster
Executive Director of Governance & Business
Planning and Company Secretary