

## **Modern Slavery and Human Trafficking Statement**

### **Introduction**

This statement highlights our (Vale of Aylesbury Housing Trust) approach to understand all potential modern slavery risks related to our business in compliance with section 54 of the Modern Slavery Act 2015. This approach is aimed at ensuring that there is no slavery or human trafficking in our business and our supply chains. This statement relates to the financial year 1 April 2016 to 31 March 2017. Our turnover exceeds the £36 million turnover threshold set by the Modern Slavery Act (Transparency in Supply Chains) Regulations 2015 for the relevant financial year.

We operate solely in England and all of our first-tier suppliers are UK based. However, as we commission construction and refurbishment projects for our properties, we effectively operate in a 'high risk' sector. We are aware that the construction industry is more susceptible to modern slavery and human trafficking than many other sectors, even for those companies operating solely within the UK.

We recognise that we have a responsibility to take a robust approach to slavery and human trafficking. We are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our infrastructure is free from slavery and human trafficking.

### **Supply Chain**

We have conducted a survey of our significant construction related suppliers to ensure there is no known modern slavery or human trafficking in the supply chain. There was a 100% response rate from the 29 suppliers asked. Of those 29 suppliers, 10 are required to prepare their own transparency in supply chains statement.

No supplier had any reason to suspect there is slavery or trafficking in their supply chain. Many suppliers have specific anti-slavery and anti-trafficking policies in place. 23 of our suppliers are members of a construction industry federation. All suppliers confirmed they pay all their UK staff at least the national minimum wage and all suppliers with overseas branches confirmed they comply with the minimum wage legislation in the countries in which they operate. 26 of the suppliers ensure they check the identity of employees of sub-contractors from high risk countries including Slovakia, Romania, Poland, Lithuania and Hungary.

Most of our suppliers are well known to us. We have no reason to suspect that our suppliers might have slavery or human trafficking in their own organisations or their supply chains.

The responses to the questionnaire, combined with our relationships with and knowledge of our suppliers, has satisfied us that there is no slavery or human trafficking in our supply chain. We are further satisfied that there are robust procedures in place to ensure that any occurrence of slavery or human trafficking will be identified by us or our suppliers.

## Relevant Policies

We operate the following policies that support preventing slavery and human trafficking in our operations and supply chain:

- **Whistleblowing Policy** - we encourage all employees, customers and other business partners to report any concerns related to our direct activities, or supply chains. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. Our whistleblowing policy is contained in an internal document (confidential reporting policy) and made available to all employees on our Intranet.
- **Employee Code of Conduct** - our code makes clear to employees the actions and behaviour expected of them when representing us. We strive to maintain the highest standards of employee conduct and ethical behaviour.
- **Recruitment / Agency Workers Policy** - we use only specified, reputable employment agencies to source labour and always verify the practices of any new agency we are using before accepting workers from that agency.

## Awareness-raising Programme

We have raised awareness of modern slavery issues by informing all of our employees by using our intranet service and eLearning system.

This information explains to employees:

- The basic principles of the Modern Slavery Act 2015;
- How employers can identify and prevent slavery and human trafficking;
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties; and
- What external help is available, for example through the Modern Slavery Helpline

## Review

This statement will be reviewed and published annually.

This statement is approved by our Board and signed on its behalf by:

**Stephen Stringer**

Chair of Vale of Aylesbury Housing Trust.