

Phoenix Community Housing Association Group Statement on Modern Slavery and Human Trafficking

Responsible Officer

Director of Finance

Introduction

The Modern Slavery Act 2015 requires large companies with a turnover of over £36m, which supply goods, or services, to publish information each financial year to reflect the steps taken to ensure there is no slavery or human trafficking in their business or supply chains.

Aim of this Policy Statement

Phoenix Community Housing Association (Phoenix) is committed to preventing modern slavery and human trafficking within our organisation and throughout our supply chains. This statement sets out the steps we have taken, and actions we intend to take, to minimise the risk of modern slavery in connection with our operations as well as our expectations of others we work with.

This Statement will be reviewed annually to meet our reporting requirements under S54(1) of the Modern Slavery Act 2015.

Policy Statement

Our Organisation and Business Function

Phoenix Community Housing Association is registered with the Financial Conduct Authority under the Co-operative and Community Benefit Societies Act 2014 (30057R) and is registered with the Regulator of Social Housing (L4505).

Phoenix Agency Services Ltd is a registered company (8436155) and a wholly owned subsidiary. The Company's principal activity is the provision of the repairs and maintenance service for the housing stock owned and managed by Phoenix Community Housing Association.

Home Makers the Property People Ltd is a private registered Company (11418010). The Company's principal activity is the provision of a housing management and lettings service to private landlords.

The Phoenix Group owns and manages over 7,600 properties and employs around 240 staff. Our main purpose is to manage and supply housing to people with a housing need. It is important to us to conduct our business ethically and in line with our values and vision:

"Together, we are building a better future for our Phoenix Community"

Areas of risk

Phoenix operates exclusively within South East London. As a result we have assessed the risk of modern slavery occurring within our organisation and supply chains as relatively low. The biggest areas of risk we have identified are:

- contracted (and subcontracted) labour in relation to construction and property maintenance.
- our assets, specifically the homes we own and or manage, being used to facilitate human trafficking and modern slavery.
- residents (particularly children) living in the homes we manage being coerced into modern slavery.

Procurement and supply

We aim to ensure employees and workers are not subject to any form of forced, compulsory or bonded labour in our supply chains and all employees have the freedom to terminate their employment at any time without penalty, giving reasonable notice.

We have updated our standard tender documents and the standard terms in our contracts and service level agreements. This will ensure that potential future suppliers and partners are aware of our position on modern slavery and human trafficking. We will also ensure we check the statements of suppliers with a turnover of over £36M, obtain signed declarations that all suppliers with whom we spend in excess of £1.2m comply with the legislation and ask all suppliers about their approach to eliminating modern slavery during procurement and as part of our annual due diligence checks.

We will also carry out due diligence checks to identify any potential future supplier with a high risk of involvement in slavery and will continuously review our existing suppliers and contracts to ensure suppliers and contractors are taking appropriate steps to minimise slavery.

We will investigate any alleged activity that relates to anti-slavery and human trafficking; and where an unacceptable practice is found, we will work with the supplier, police and support agencies to remedy this. Where the breach is severe or not remedied in an appropriate timeframe, we will seek to terminate our relationship with that supplier.

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

Our People- employment

We have robust procedures in place for vetting new employees and confirming their identities. We ensure that all staff are eligible to work in the UK and only pay salaries directly into employees' personal bank accounts.

We pay all our staff above the London Living Wage and expect all our suppliers to pay the London Living Wage or equivalent, if outside London.

We have processes in place to ensure that we comply with UK employment law, including regular training and updates for key staff.

We will only work with employment agencies that are compliant with the Modern Slavery Act 2015 and this statement and will check any agency staff we directly employ.

Our Homes and other assets

We have identified the use of our properties to facilitate modern slavery as a risk. To use a Phoenix property for any criminal, anti-social or illegal purpose is a breach of tenancy which we will enforce to ensure that our homes are not being used to facilitate modern slavery. We carry out tenancy audits on our properties, to ensure the correct people are living there. We also work in partnership with the Police and local authorities to share intelligence to increase our ability to identify where modern slavery may be taking place.

When our homes are empty they are allocated to new tenants using Find My Home- the choice based lettings system operated by Lewisham Council. We also make checks to confirm the identity of all new tenants. If a tenancy is later found to have been granted following a fraudulent application, we have appropriate procedures to investigate and if required end the tenancy.

HomeMakers manages properties on behalf of other landlords that are let to private tenants in our area. Identity checks on both landlords and tenants are completed, to ensure the right to rent checks and tenancy management procedures are in place to manage these properties too.

Training

All staff whose work involves direct contact with residents must attend mandatory safeguarding training to identify if someone they come into contact with is at risk. This includes how to identify modern slavery and trafficking when working with residents.

To promote our commitment to safeguarding, we offer our contractors and partners an induction to safeguarding, when they start working with us. They are expected to attend this or demonstrate compliance with our policies and procedures, through their own training.

Raising awareness and joint working

We promote safeguarding and seek to raise awareness of modern slavery and human trafficking both directly and working in partnership with other organisations including Lewisham Council. This includes articles in our newsletter, using our website and social media channels as well as workshops and stalls at some of our community events. We also provide a community chest which community groups can apply for. A number of grants have been awarded that support young people providing them with opportunities and skills which can reduce the risk of them being coerced into Modern Slavery.

Monitoring and review

Phoenix has a whistleblowing policy and encourages staff, residents and other customers to raise any concerns with us.

This statement was approved by our board and will be reviewed annually as part of our statement of internal controls which will include an assessment of how we meet the

requirements of the Modern Slavery Act. The statement of internal controls is considered by the Audit Committee and approved by the Group Board annually.

The full statement will be reviewed in full at least once every 3 years.

Legislation

- Modern Slavery Act 2015.
- Care Act 2014.

Reference to other documents and associated policies and procedures

We have a range of policies and procedures which contribute to preventing human trafficking and modern slavery. These include:

- Safeguarding Policy and Procedures
- Equality Charter
- Recruitment Policy
- Whistleblowing Policy
- DBS Policy and Procedures
- H&S Policy
- Tenancy Management policies and procedures
- Procurement Strategy, Policy and Procedures
- Codes of Conduct- Board, staff, contractors.
- Statement of Internal Controls

Definitions

Term/acronym	Description
Resident	Includes tenants, freeholders and leaseholders.
Phoenix	Phoenix Community Housing.
Supply Chain	The System including people, activities, information and resources involved in moving a product or service from a supplier to a customer.

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