



Anti-Slavery and Human Trafficking Statement

Introduction

This statement is made in accordance with Part 6 Section 54 (1) of the Modern Slavery Act 2015 and constitutes Hightown Housing Associations' (Hightown) slavery and human trafficking statement.

Hightown operates a zero-tolerance policy towards slavery and human trafficking and will take steps to prevent it occurring in our supply chains or in any part of our business. This statement has the support and approval of our Board. Managers and staff are expected to report any reasonable suspicion that slavery and human trafficking is taking place.

About Hightown

Hightown is a charitable housing association registered society under the Co-operative and Community Benefit Societies Act 2014. It owns and manages over 6,500 properties, provides a range of care and supported housing services to over 800 people and develops around 400 new affordable homes each year.

Hightown operates entirely in England and almost exclusively in highly regulated sectors. Many of its contracts are with public sector organisations. Other than in very rare circumstances, it sources all of its goods and services from UK based suppliers.

We have policies in place which help mitigate the risk of slavery and human trafficking within our business, including:

- Safeguarding Adults and Children Policy
- Confidential Reporting (Whistleblowing) Policy
- Equality & Diversity Policy
- Anti-bribery Policy
- Recruitment Policy
- Procurement Policy
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Hightown adheres to the National Housing Federation's Code of Conduct and Code of Governance.

Our Supply Chains

Hightown expects its suppliers not to use slave labour or engage in human trafficking and requires all new suppliers to confirm this by submitting their tender or by a statement that they are not in breach of the Modern Slavery Act.

Our tender documentation includes a provision for the mandatory exclusion of any bidder convicted of an offence under sections 1, 2 or 4 of the Modern Slavery Act 2015 and we seek to impose provisions for termination in the event of a modern slavery or human trafficking compliance breach by the supplier during the period of the contract.

Our contractors are expected to notify us if they have been in breach of the Act.

Compliance

Hightown may instruct its agents to conduct checks of key suppliers where there are suspicions that there may be non-compliance with the above legislation. Should a breach be identified, Hightown may provide the supplier with an opportunity to rectify the problem and implement a corrective action plan but reserves the right to remove the supplier from its supply chain.

Safeguarding

We have safeguarding policies and procedures in place to guard against the risk that our tenants or service users are or become victims of slavery or human trafficking.

We have an appointed two Safeguarding Lead Officers and have procedures in place for reporting any safeguarding issue including suspicion of modern slavery.

Training

We take steps to ensure staff are aware that safeguarding is everyone's responsibility and that staff have the training they need to be able to identify and report modern slavery if they suspect it.

Hightown's internal processes for Recruitment and Procurement address compliance with The Modern Slavery Act 2015. Recruitment staff receive appropriate training to enable them to conduct checks on documents such as passports and other forms of identification, to avoid being party to trafficking. All staff have access to E Learning covering Anti-Slavery and Human Trafficking and are pointed to the Modern Slavery website www.modernslavery.co.uk to gain further information about types of slavery, signs to spot, online or telephone reporting and referral processes for victims.

Risk Assessment

We have assessed the risk of Slavery and Human Trafficking occurring in our operations and supply chain and consider the risk generally to be low. We consider the risk to be higher in the building and maintenance areas of our supply chain than in other areas.

However, in the period since the introduction of the Act and in the past year, we have not become aware of any instances of slavery or human trafficking relating to our business and we consider that this is the key indicator for our measuring our performance in preventing Slavery and Human Trafficking.

Review

We review annually our approach to the eradication of slavery and human trafficking and modify our activities as appropriate.

We will maintain regular communication with our staff on the issues around slavery and human trafficking to maintain awareness and will incorporate, where appropriate, issues relating to slavery and human trafficking when we update policies and procedures.

We will ensure that this policy is reviewed annually and is widely communicated to our stakeholders and to the public via our website.

Hightown Housing Association Limited
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