

# Modern Slavery and Human-Trafficking Statement

## Introduction

We are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

This statement sets out Alliance Homes' commitment to understand all potential modern slavery risks related to our business and the activities that are aimed at ensuring that there is no slavery or human trafficking in our own business and our supply chains. This statement relates to actions and activities during the financial year 1 April 2023 to 31 March 2024.

Working within the housing sector Alliance Homes recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Modern Slavery Act 2015 (MSA) consolidates various offences relating to human trafficking and slavery.

In broad terms:

- 'slavery' is where behaviour as if there was a right of ownership is exercised over a person;
- 'servitude' involves coercion to oblige a person to provide services;
- 'forced or compulsory labour' is where a person works or provides services on a non-voluntary basis under the threat of a penalty;
- 'human trafficking' involves arranging or facilitating the travel of a person with a view to exploiting them;
- 'child labour' covers particular types of work, which can depend upon age, that deprives children of their childhood, dignity and potential and harmful to their physical and mental development.

Section 54 of the Act imposes a legal obligation on large commercial organisations to report on transparency in supply chains. This will require the publication of an annual slavery and human trafficking statement.

## Organisational structure and supply chains

The Alliance Homes Group consists of NSAH (Alliance Homes) Limited (NSAH), Alliance Living Care Limited (ALC), Alliance Homes Partnerships Limited (AHP), Alliance Homes Design & Build Limited (AHD&B), Alliance Homes Sales Limited (AHS) and Alliance Homes Ventures Limited (AHV). NSAH is the parent company and is a registered society and exempt charity operating in the West of England.

- We own and manage 6,500 homes and deliver a range of projects to build stronger communities.

- AHP is a partnership with Brighter Places (BP) and Bristol Community Land Trust (BCLT). Through this partnership we deliver home repairs and gas servicing to our existing 6,500 homes and an additional 4,000 homes in Bristol owned by BP and BCLT.

This statement covers the activities of the Alliance Homes Group:

- Alliance Homes offers a broad range of products to meet the housing needs and aspirations of our customers, based on their personal circumstances. This will include a range of housing solutions for those unable to access market priced housing.
- We work to make a positive difference to the lives of customers through strengthening communities, working in partnership with others to build capacity, create employment opportunities, and promote independence.
- We operate an active asset management strategy that seeks to maximise the effective use of capital, maintaining high accommodation standards and reducing fuel poverty.
- We will work to drive innovative service delivery solutions that enhance the customer experience and promote efficient and effective use of resources.
- We will strive to ensure that our properties are not used for slavery purposes through effective tenancy and property management. Our operatives and frontline staff are a key line of defence in preventing modern slavery.
- In short, we exist to make a positive difference to people's lives.

Alliance Homes spends a significant amount of money on procuring goods, works and services. In procuring these services, via a supplier, social enterprise or another public sector supplier we want to maximise value and best practice, while ensuring that the highest ethical standards are met. Our auditors audit our supply chain requirements.

## Risk

Our approach to risk management is outlined in the organisation's Risk Management Policy. Its objective is to manage all types of risk facing the Group, to enable it to take advantage of opportunities and minimise losses to enable the achievement of the Group's Plan A and maintain the confidence of external stakeholders in the Group.

## High-risk activities

We do not believe we have any activities that are considered to be at high risk of slavery or human trafficking.

## Responsibility

Responsibility for the Alliance Homes anti-slavery initiatives is as follows:

- Policies: The Group maintains a schedule that identifies a clear responsible lead for every policy within the Group. Each responsible individual ensures that policies are managed and leads the development of new, and review of existing, policies and procedures. All policies are subject to a sign-off process and include an Equality Impact Assessment. Modern Slavery impacts across a range of policies.

- Investigations/due diligence: Our Internal Auditors have a forensics and investigations team who would look into any lack of probity. The work would be scoped, and an appropriate fee charged.

## Relevant policies

Alliance Homes operates the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- **Whistleblowing** Our Whistleblowing Policy helps ensure that the Public Disclosure Act is applied in all cases. We encourage our colleagues, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of The Group. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing guidance is designed to make it easy for colleagues to make disclosures, without fear of reprisal. Colleagues, customers, or others who have concerns can use our confidential helpline.
- **Colleague code of conduct** Our code of conduct makes clear to colleagues the actions and behaviour expected of them when representing The Group. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chains.
- **Procurement Policy** Our Procurement Policy defines how we will procure products and services, ensuring that we comply with all relevant legislation and seek to add Social Value to the contracts we procure. We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Contractors are required to demonstrate that they provide safe working conditions where necessary, treat colleagues with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment Policy** We use only specified, reputable employment agencies to source employees and always verify the practices of any new agency before using them. In addition we provide managerial guidelines for the use of agency workers, including advice on the worker's rights.
- **Safeguarding Policy** Our policy makes clear our values, principles and policies underpinning the safeguarding of adults and children and risk of abuse. Alliance believes in making safeguarding personal which means it should be person-led and outcome-focused. It engages the person in a conversation about how best to respond to their safeguarding situation in a way that enhances involvement, choice and control as well as improving quality of life, wellbeing and safety.
- **Human Rights Policy** This lays out our commitment to protecting the human rights of colleagues, customers, and our supply chain, specifically mentioning labour-related matters.

## Due diligence

Alliance Homes undertakes due diligence when considering taking on new suppliers, and regularly reviews our existing suppliers. Our due diligence and reviews include:

- Alliance Homes' due diligence approach to Procurement is clearly outlined in our Procurement Policy.
- During 2023/2024 we worked to introduce a new Due Diligence Framework for procurement purposes with Modern Slavery being identified as a key element and included in our standard procurement / tender templates.
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers if needs be and requiring them to implement action plans.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

## Performance indicators

We currently review our compliance with all relevant legislation which includes the MSA. We review and seek to rectify any areas of under performance against these measures monthly.

## Awareness-raising and training programme

We actively raise awareness with our colleagues, through training and sign-posting to other information sources, explaining:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what colleagues can do to raise potential slavery or human trafficking issues to the relevant parties within Alliance Homes; and
- what external help is available, for example through the Modern Slavery & Exploitation Helpline, Gangmasters & Labour Abuse Authority and "Stronger together" initiative.

Our online e-learning platform contains a specific area dedicated to Modern Slavery and Human Trafficking. The content, which is available to all colleagues, includes:

- the Government's 'Modern Slavery is closer than you think' video in order to provide them with an awareness of modern slavery;
- an e-Learning module "Modern Slavery" designed to not only raise awareness but also help people recognise their role in identifying and reporting concerns;
- a further e-Learning module "Working with the Modern Slavery Act" which looks at the key provisions of the Act around the prevention of forced labour and human trafficking and ensuring greater transparency of supply chains;
- links to the BBC series "Making a Slave";

- a Modern Slavery briefing document; and
- links to the Modern Slavery & Exploitation Helpline.

We continue to review and develop our practices including:

- our business' purchasing practices, which influence supply-chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to identify the signs of slavery and human trafficking;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps should be taken if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

## Board approval

This statement has been approved by the Board of NSAH (Alliance Homes) Ltd on behalf of the Group, who will review and update it annually.

**Signed by the Chair of the Board:**

A handwritten signature in black ink, appearing to read "Andrew Willis".

Name: ANDREW WILLIS

Date: 21 August 2024

**Signed by the Chief Executive Officer:**

A handwritten signature in black ink, appearing to read "Louise Emma Swain".

Name: LOUISE EMMA SWAIN

Date: 21 August 2024