



MODERN SLAVERY AND HUMAN TRAFFICKING 2022-23 STATEMENT

1. Introduction

- 1.1. This statement sets out Hanover (Scotland) Housing Association's (herein known as Hanover) position for the prevention of all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.
- 1.2. This statement relates to actions and activities during the financial year 1st April 2022 to 31st March 2023.
- 1.3. As part of the housing and care sector in Scotland, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.
- 1.4. Our organisation is absolutely committed to preventing slavery and human trafficking in all its activities including in our supply chain.

2. Organisational structure

- 2.1. Hanover is a Registered Social Landlord (RSL) working across 26 Local Authority Areas in Scotland. Our core purpose is to help older people feel safe and secure at home and to live fulfilling and independent lives.
- 2.2. We provide housing and care services, mainly for older people and we currently provide more than 4,500 homes for rent throughout Scotland. Our services include affordable, rented housing, the delivery of care and support in our sheltered and very sheltered developments, the delivery of a Telecare Service for tenants and external customers and factored housing support services.

3. Our Supply Chain

- 3.1 We do not have any direct supply chain outside of the United Kingdom. Hanover does not trade directly with any other country. Our most significant supply chain is through the delivery of materials for both programmed works, day to day repairs, new build development and equipment and materials used by the Asset Management team to ensure our properties meet the required standards. These materials and associated services will be procured, and we will ensure, as part of our procedures, that all suppliers sign up to their obligations under the Modern Slavery Act 2015.

4. Appointment of Contractors

- 4.1 Our contractors are appointed in line with the Scottish Government Procurement Regulations & Guidance and our Procurement Policy and Contract Management Framework. This means that before any appointment of a supplier a robust and transparent procurement process takes place. As part of the procurement process, we will require notification by contractors / suppliers that they are fully compliant with the Modern Slavery Act 2015.

5. Responsibility

5.1 Responsibility for our approach to anti-slavery and human trafficking lies in the following areas:

- **Policies:** The Board (or delegated Committee) are responsible for the approval policy documents in line with our Scheme of Delegation. Our Executive Leadership and Senior Management Teams (ELT/SMT) are responsible for the implementation of and adherence to policies

As part of our process to roll out new and updated policies, the relevant Policy owner will be responsible for ensuring that each applicable policy includes the appropriate references to our modern slavery and human trafficking approach.

- **Risk assessments:** if, as identified through our operational risk registers, we believe there to be an increased or significant risk of non-compliance with our anti-slavery and human trafficking approach, we will then implement action plans to mitigate risks. This would be coordinated by the Procurement Team
- **Investigations / Due diligence:** Were an investigation to be required into the possible use by a supplier or contractor of modern slaves and/or trafficked individuals, this would be coordinated by the Governance & Transformation Team and results reported to the Audit, Risk and Performance Committee.
- **Training & Awareness:** employees will be made aware of our approach through our policy rollout process. Any specific training on this would be arranged by our HR&OD team.

5.2 *Due diligence*

5.2.1 We will undertake due diligence when considering taking on new suppliers in line with our Contract Management Framework. We will undertake regularly reviews our existing suppliers/ contractors through our Procurement Process. This process will include:

- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans where there are any areas of concern.
- Where appropriate, we will ask suppliers to participate in collaborative initiatives focused on human rights in general, and slavery and human trafficking.
- 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 possible termination of the business relationship.

6. Relevant policies

6.1 We have the following policies that support our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

6.2 *Procurement Policy & Contract Management Framework*

6.2.1 We are committed to ensuring that suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

6.2.2 During 2022-23, we will implement a Supplier Code of Conduct and that too will be linked to ensuring compliance with the Modern Slavery Act 2015.

6.3 *Recruitment Policy & Agency Workers Procedure*

6.3.1 Our policy sets out that we use only specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from that agency. This is aligned to the Contract Management Framework.

6.4 *Whistleblowing Policy*

6.4.1 Through this policy, we encourage all our employees, customers, stakeholders, and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. 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 workers to make disclosures, without fear of retaliation.

6.5 *Health Safety & Wellbeing Policy & Framework*

6.5.1 Our Policy and Framework sets out the measures and procedures we have in place to ensure the Health Safety and Wellbeing of all our employees.

6.6 *Dignity at Work Policy*

6.6.1 This policy sets out our belief that all employees have a right to work in an environment which is free of harassment and bullying, and where everyone is treated with dignity and respect.

7. **Key Performance Indicators**

7.1 During 2022-23 we will establish KPIs within our Contract Management Framework which will monitor compliance with the Modern Slavery Act 2015.

7.2 This will include our compliance with new suppliers through the procurement process and a regular review of existing suppliers.

7.3 KPIs will be reported to the Senior Management Team (SMT) as required, alongside analysis of the PIs and detailed improvement action where required.

8. **Training & Awareness**

8.1 We will require all employees working in our supply chain management and HR professionals within our organisation to complete training on Hanover's approach to Modern Slavery. The frequency of this training will be set out in the organisation's Learning & Development plan and will cover:

- Hanover's procurement 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 our National Minimum wage.
- How to assess the signs, and therefore risk of slavery and human trafficking to Hanover
- The process for managing any suspected instance of reported slavery or human trafficking which will include:
 - What external help is available for helping us to manage such issues
 - What communication we have with suppliers and contractors about our approach to Modern Slavery and Human Trafficking

- What communication we will have with our employees on our approach
- What steps our organisation should / could take if suppliers or contractors do not follow our required process for Modern Slavery & Human Trafficking, including possible removal from our supply chains

9. Statement Approval & Review

9.1 This statement was approved on 24th March 2022 by the Board and is signed off below by the Chief Executive. The Board will review and re-approve this statement annually.

CEO Name	Angela Currie
CEO Signature	
Date	24 th March 2022