

# **Bolton at Home Group**

## **Modern Slavery and Human Trafficking** **Statement 2021/22**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that the Bolton at Home Group has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within the business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Bolton at Home Group has a zero tolerance approach to any form of modern slavery. We are committed to acting fairly, ethically and with integrity in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or supply chain.

### **1. Our Business**

Bolton at Home is a Community Benefit Society and has a group structure managing approximately 18,000 homes' across Bolton as well as several subsidiary companies. The subsidiaries include the following businesses; 'Starts With You Ltd.', 'Arcon Housing Association', 'Maxmedia Communications Ltd.', 'R-Haus Living Ltd', Stonecross Homes and 'Arcon Developments Ltd'.

We directly employ approximately 1,000 staff across the Group and are an accredited Living Wage Employer.

We are committed to being a great place to work and offer all apprentices employed with us a commitment to be paid in most instances the Living Wage, equal terms and conditions to substantive staff and excellent employment opportunities.

### **2. Our Policies**

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- **Recruitment Policy.** We operate a robust recruitment process, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

- Employee Pay Policy. We have in place a clear policy which outlines all the terms of conditions of pay and associated allowances within the organisation.
- Whistleblowing Policy. We operate a Whistleblowing Policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- Code of Conduct Policy. This code outlines the expectations of behaviour and conduct of those working for the organisation.
- Safeguarding Policy. We ensure our Safeguarding Policy reflects the principles and ensures reporting of any concerns to be identified by staff and are escalated as appropriate.
- Disciplinary Policy. This policy would deal with any contraventions or breach from staff in relation to Modern Slavery.
- Apprenticeship Framework. This Framework sets out our approach to Apprentices to ensure fairness, equality and pay policy appropriate to qualifications.
- Policies for Board Members. There are a range of policies in place for Board Members to outline expectations of how governance should take place across the Group.

### **3. Our Suppliers**

Bolton at Home Ltd's procurement process promotes good practice throughout the Supply Chain, in relation to the prevention, detection, investigation, and prosecution of offences, as well as the identification of the victims of those offences. Each organisation is asked to declare that they are not, nor their supply chain, involved in slavery and human trafficking and are fully compliant with the Act.

In addition to the above, as part of our contract with suppliers, we require that:

1. They have taken steps to eradicate modern slavery within their business by providing a statement of the steps that the organisation has taken/is taking to ensure that slavery and human trafficking is not taking place:
  - in any of its supply chains;
  - in any part of its own business and provide monitoring information on HR related issues.
2. The Supply Chain report on the processes and due diligence taken to ensure that their supply chains are slavery free.
3. They are fully compliant with the Modern Slavery Act 2015.
4. (For UK based suppliers) They pay their employees at least the national minimum wage / voluntarily implement the national living wage

5. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations.

Bolton at Home Ltd. make known to organisations that any contravention/breach of relevant slavery and human trafficking legislation may lead to termination of any contract and removal from any approved list of suppliers, contractors and consultants engaged.

#### **4. Training/Communication**

We have a number of ways in which we will provide awareness to staff to increase their understanding of the Modern Slavery Act. These include:-

1. The statement is available to all employees on the intranet to ensure a high level of understanding.
2. Safeguarding training is mandatory for all employees
3. Awareness is made available as part of the new starter process.
4. Increased awareness for employees is delivered via E learning/Training

#### **5. The process we follow if Modern Slavery is suspected**

##### **Bolton at Home**

1. If a member of staff suspects modern slavery they are required to record/write down details of the concern i.e. what the concern is about, location of the concern, time of any events, descriptions of those involved, any vehicle details involved, conversations with anyone regarding the concerns raised – including names, addresses and contact numbers.
2. Forward this information without delay to Safeguarding Team via email
3. If as part of uncovering concerns regarding modern slavery and it is established there is an immediate concern i.e. somebodies safety is in danger, the police will be contacted immediately on 999.
4. A referral to the Safeguarding Team still needs to be made to who will then liaise with the police.
5. If staff become aware of an incident of modern slavery at weekend and over Bank Holiday periods they must contact the police on 999. Again they must also email the Safeguarding Team regarding the incident.

## **6. Going forward to 2021/22 we will:-**

1. Ensure employees and our subsidiaries are aware of their duties regarding Modern Slavery and what steps to take if they suspect abuse and extend training via e-learning as well as awareness campaigns
2. Continue to ensure that the Suppliers and Contractors we commission adhere to the conditions outlined in our Modern Slavery statement.
3. Continue to work closely with the Local Authority and other agencies and report cases of Modern Slavery.
4. Continue to work with our recognised Trade Unions to ensure good employment terms, conditions and practises for employees
5. Raise awareness with our customers via social media.
6. Review our Confidential Reporting Policy to ensure it covers the reporting of Modern Slavery suspicions.

## **7. Our Subsidiaries**

### **Starts with You Ltd.**

Starts with You Ltd. (SWY) is committed to tackling Modern Slavery and will ensure that employees and managers are fully trained and aware of issues of Modern Slavery and their Modern Slavery Sand Human Trafficking Statement.

SWY have policies in place to ensure business is conducted in a fair and ethical manner including Safeguarding, Whistleblowing, Grievance, Code of Conduct etc. SWY policies include measures to aid prevention of Modern Slavery and are regularly updated to ensure they are compliant with legislation and incorporate best practice.

SWY are committed to aiding prevention of Modern Slavery in our supply chain and require copies of Modern Slavery Statements for all approved suppliers and those who provide products and services in excess of £5,000 and have their own form for reporting cases to Bolton at Home's Safeguarding Team.

SWY ensure that employees and managers are fully trained and will publicise the statement to their own staff.

## **Arcon Housing Assoc.**

1. If staff suspect modern slavery they will record/write down details of the concern i.e. what the concern is about, location of the concern, time of any events, descriptions of those involved, any vehicle details involved, conversations with anyone regarding the concerns raised – including names, addresses and contact numbers.
2. Forward this information without delay to the Safeguarding team in the local authority where the concern has occurred. This may be telephone or email or via the website depending on each local authority's referral process.
3. If as part of uncovering concerns regarding modern slavery and it is established there is an immediate concern i.e. somebody's safety is in danger, the police will be contacted immediately on 999.
4. A referral to the appropriate Local Authority Safeguarding Team still needs to be made, so they can then liaise with the police.
5. If staff become aware of an incident of modern slavery at weekend and over Bank Holiday periods they must contact the police on 999. Again they must also contact the appropriate local authority Safeguarding Team regarding the incident to make a referral.

Employees have access to mandatory e-learning including Modern Slavery delivered via Bolton at Home.

## **R-Haus Ltd, ADL and Stonecross Homes.**

Employees acting on behalf of R-haus Living Limited, Acron Developments Limited and Stonecross Homes Ltd would follow steps 1 to 5 of the Bolton at Home process, however would contact the relevant local authority. Each of the local authorities that the companies operate in have a Safeguarding policies and as with the Bolton at Home's policy would contact the police if at weekend, Bank Holiday or after 5p.m.

Currently the local authorities covered in addition to Bolton are across Greater Manchester and the wider region. Staff who carry out work on behalf of R-haus Living Limited, ADL and Stonecross are either Bolton at Home or Arcon employees and therefore will have carried out all training and awareness made available through Bolton at Home and Arcon.

## **Maxmedia Communications Ltd.**

Maxmedia will ask their suppliers for a copy of their Modern Slavery statement if applicable. Suppliers with less than 3 full or part time staff members (such as freelance staff) would not need to supply statements.

If cases of Modern Slavery are suspected they would follow the Bolton at Home process outlined above.

Employees will have access to mandatory e-learning including Modern Slavery delivered via Bolton at Home.

Any breaches of Modern Slavery identified by the Bolton at Home Group will be reported to the Board on an annual basis.

This statement will be reviewed annually by the HR Directorate.