

## 2015/16 Modern Slavery Statement

This statement sets out Accent Group's commitment to preventing slavery and human trafficking in all its business activities and within its supply chains. It outlines the steps we have taken to ensure compliance with the Modern Slavery Act 2015 (MSA).

### Organisational structure

Accent Group is a national social housing provider, owning and managing over 21,000 homes in England.

Accent Group Limited (AGL), our Group parent, is a charitable registered society under the Co-operative and Community Benefit Societies Act 2014; it is also a registered provider of social housing with the Homes and Communities Agency. Within our group structure there are a number of subsidiaries including Accent Corporate Services Limited, Accent Peerless Limited, Accent Nene Limited and Accent Foundation Limited (AFL).

Whilst our modern slavery statement applies to the whole Group, and all parts of the Group are expected to minimise the risks of slavery and human trafficking in their business and supply chains, AFL is the only subsidiary with sufficient turnover to require formal coverage by this statement. We have taken steps to satisfy ourselves that the supply chain for AFL is satisfactory in terms of the requirements of both the MSA as well as meeting any formal requirements we set out for our suppliers.

### Compliance

Responsibility for compliance with the MSA rests at the highest level with our Board of Management, with compliance responsibility assigned to the Head of Assurance and Audit.

Our supply chain consists mainly of services rather than goods with the highest risk areas being associated with our building and maintenance activity. We do not have any supply chain outside the United Kingdom. We operate a centralised supply chain using a 'purchase to pay' system which requires the use of pre-approved suppliers; this means that there are more rigorous controls in place prior to expenditure being committed as well as improved visibility for retrospective checks.

### Policy Framework

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our policy framework reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## **Procurement**

Our procurement approach is designed to ensure that we achieve value for money whilst ensuring that we are legally compliant. As a result, we now require all new suppliers to confirm that they have made sufficient checks on their employees and supply chains and a requirement in all new contracts to comply with the provisions of the MSA.

## **People**

Our People Strategy is clear that Accent Group is committed to dignity at work and fair treatment of all colleagues. We have reviewed our Whistleblowing Policy and Code of Conduct to ensure they are compliant.

## **Recruitment**

A new Recruitment and Selection Policy contains relevant requirements in terms of checking of eligibility to work in the UK and carrying out of necessary checks such as DBS (Disclosure and Barring Service).

## **Due diligence**

We have undertaken risk assessments in respect of these key areas and put measures in place to mitigate them. These include:

- Undertaking a review of our policy framework and instigating amendments to support compliance.
- Screening our procurement documentation to ensure that adequate safeguards are in place at each stage in the process i.e. pre-qualification questionnaires and formal tender.
- Ensuring that any permanent or temporary member of staff is subject to appropriate checks and balances within recruitment systems such as eligibility to work in the UK and Disclosure and Barring Service (DBS) checks.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

A handwritten signature in black ink, appearing to read 'Gordon Murray', with a stylized flourish at the end.