

Modern Slavery Statement 2020-2021

1. Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps taken to ensure that there is no modern slavery or human trafficking in our organisation or supply chains. Tower Hamlets Homes (THH) has a zero-tolerance approach to any form of modern slavery or human trafficking. We are committed to acting in an ethical manner, with integrity and transparency in all our business dealings. This statement refers to actions and activities during the financial year 1 April 2020 to 31st March 2021.

Definition: Modern slavery is the illegal exploitation of people for personal or commercial gain. It covers a wide range of abuse and exploitation including human trafficking, forced labour and debt bondage.

2. Business structure, supply chains, procurement, and policies

THH is an Arms-Length Management Organisation that manages around 21,000 homes and provides services for some of the most diverse and disadvantaged communities on behalf of the London Borough of Tower Hamlets.

Our Executive Management team is made up of the chief executive, director of asset management, director of finance, director of business transformation and director of neighbourhood services. Our chief executive reports to the THH Board, which sets our strategic direction and uses its expertise to assist in guidance and decision making. It takes a close interest in and monitors performance, finance and improving services. It works closely with the council to ensure our work helps deliver the Mayor's priorities.

We employ 540 staff with a Head Office on the Isle of Dogs, Tower Hamlets.

Our purpose is to create great homes, great services, and great communities. Our Business Plan 'Create Great' aims to deliver this until March 2026.

Supply chains and procurement

Our supply chains include an extensive range of contracts with external suppliers involving a variety of works, goods, and services. Our procurement activities take place in England and our contractors and suppliers are UK-based. We recognise our responsibility to tackle modern slavery and human trafficking. THH is committed to the part it plays as a public sector organisation in identifying, disrupting, and ultimately eliminating modern slavery and human trafficking from its business and that of its subcontractors, partners, and supply chains.

Our suppliers must subscribe to the council's Supply Chain Ethical Code of Conduct that sets out the obligation for our suppliers in ensuring that the working conditions in THH's supply chains are safe, that workers are treated with respect and dignity, and that manufacturing processes are environmentally responsible. Breaches to the Supply Chain Ethical Code of Conduct will lead to the termination of the business relationship.

Repairs contracts include the following clauses which stipulate our requirements in terms of anti-slavery and anti-human trafficking due diligence:

The Service Provider must:

- Take appropriate steps to ensure that there is no modern slavery or human trafficking in its supply chains.
- Implement due diligence procedures for its subcontractors.
- Require all subcontractors to warrant that, neither the subcontractor nor any of the subcontractor's officers or employees have been convicted of any offence involving modern slavery or human trafficking; or have, to the best of the subcontractor's knowledge, been the subject of any investigation, inquiry, or enforcement proceedings regarding any offence or alleged offence in connection with modern slavery and human trafficking.
- Require all subcontractors to include provisions having the same effect as this in all their subcontracts relating to the works (i.e. at any stage of remoteness from THH as the client in the supply chain).

During the procurement process, submissions which fail to demonstrate that they meet the requirements on fundamental aspects such as this will be excluded. Thereafter, during the contract, it is a requirement for the supply chain to continue to meet these requirements and to demonstrate so, upon request.

People Services (HR) practices

THH is committed to the highest standard of quality, probity, openness, and accountability. To support this aim, we have several clear people services and governance policies in place that relate to the prevention of modern slavery:

- **Recruitment and selection** – In line with our recruitment and selection policy, we operate a transparent recruitment process, subject to the oversight of our professionally qualified people services team. Our offer of employment is subject to the following rigorous processes:
 - Acceptance of the terms and conditions contained within the contract of employment.
 - The receipt of satisfactory references, generally from previous employers.
 - Evidence of any required qualifications (e.g. professional qualifications, driving license, etc.).
 - Satisfactory disclosure and barring service check, where applicable.
 - Proof of identification.
 - Proof of eligibility to work in the UK.
- **Temporary and agency workers** – Our temporary and agency workers policy sets out our approach to the engagement and management of temporary and agency workers (including those provided through umbrella companies and personal service companies). We work closely with Matrix SCM (our managed service provider) to ensure that all workers go through the same checks as THH employees. For the small number of assignments that fall outside of our these arrangements – all of which are directly authorised by our director of finance – we work to ensure that all worker checks are in place prior to engagement and that agencies adhere to all legal requirements. This includes compliance with the agency worker regulations, minimising the risk of unscrupulous employment practices. Any supplier who fails to comply with our ethics will be suspended or terminated from the supply chain until such compliance can be satisfactorily evidenced. Our employment practices include ensuring that all workers employed on temporary fixed term contracts are treated equitably in accordance with the fixed term employees (prevention of less favourable treatment) regulations. We do not employ any workers on a casual or zero hours basis, where employment rights can be limited.

- **Pay arrangements** – We pay the London Living Wage for all staff (including temporary agency workers) as a minimum, apart from apprentices (whose salary reflects at least the National Living Wage for over 25s), and graduate trainees (whose salary is set by the national scheme in which we participate).
- **Staff code of conduct** – We require all new workers to sign our code of conduct when they start their employment/assignment. This document sets clear expectations of conduct, and explicitly incorporates the principles of public life and our commitments to honesty, whistleblowing, gifts and hospitality and declarations of interest.
- **Whistleblowing** – Our whistleblowing policy provides clear routes for our staff to speak up and report concerns of fraud, misconduct, or wrongdoing without fear of recrimination or victimisation. It encourages reporting concerns and protects the whistleblower. Whistleblowing allegations are handled at appropriate levels and all instances of allegations are reported to our board, with subsequent updates of key findings/actions taken.
- **Gifts and Hospitality** – Our gifts and hospitality policy sets out a clear framework for the reporting of any offers of gifts or hospitality made to any of our staff in the course of their work for THH, ensuring that all potential conflicts of interest or personal commercial gains are actively managed.
- **Declarations of Interest** – We require all our staff to complete and submit an annual declaration of interests. This ensures that all potential conflicts of interest are recorded and managed.
- **Working Time Regulations (WTR)** – Compliance with Working Time Regulations is clearly set out within contracts of employment and built into our working practices. Staff are encouraged to take their annual leave entitlements, maintain a healthy work/life balance, and undertake work within contractual and WTR limits. WTR opt-out forms are used in exceptional circumstances and only when requested by the employee.
- **Equality Act 2010** – Compliance with the Equality Act is built into all our people services policies and procedures to ensure a working environment free from discrimination and/or harassment. In addition, a range of policies are in place to support better work/life/balance and promote flexible working among our workforce. THH also provide a range of paid leave arrangements to support staff during at times of bereavement and to assist staff with caring responsibilities.
- **Domestic Abuse** – THH is committed to supporting workers who are the survivors of domestic violence or abuse. Our domestic abuse policy sets out how THH workers can disclose this to the organisation to gain access to support and guidance. It provides guidance to managers about how to respond sensitively and practically to disclosures, as well as handling any related absences from work or allegations made by perpetrators. We also have staff domestic abuse champions who provide support to survivors.

Communication

All policies are promoted and available to staff on our intranet. Additionally, there are annual promotions to all staff of our declaration of interest and staff code of conduct practices, as part of good corporate governance. Our domestic abuse provisions are highlighted to staff as part

of our annual involvement with domestic abuse campaign events. We plan to commission an annual promotion to staff of the remaining governance practices around whistleblowing, gifts, and hospitality.

Review

All our policies and processes are subject to periodic internal auditing and review. We will ensure that explicit reference is drawn to modern slavery in the next scheduled review, to highlight the issue and ensure a high-level awareness of the risks and issues arising.

Covid-19

During the Covid-19 pandemic, our right-to-work and disclosure and barring service checks have moved online in line with government and service guidelines. We supported our staff by enabling working from home wherever possible, ensuring that managers and teams regularly meet online. We also ensure that our head office is Covid-secure and available for staff who are the survivors of domestic abuse and may prefer to work away from home. More broadly, we have adopted a progressive position on pay and leave during the pandemic, which ensures staff can observe prevailing government guidance on self-isolation and shielding without losing pay, and that they are supported in looking after children or vulnerable relatives. For our agency workers, we have adopted cabinet office guidelines and paid such non-working periods at 80% of their usual rate.

3. Due diligence processes

Due diligence in the supply chain

Tower Hamlets Homes undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers through annual spend analysis, including:

- During procurement exercises (tenders) contractors are required to provide confirmation of compliance with the Act, and where applicable provide evidence on their compliance with Section 54 of the Modern Slavery Act 2015.
- Contractors are required to pay all staff employed wholly or substantially in providing services, the London Living Wage as a minimum salary.
- Abnormally low tenders are investigated to ensure contract prices are sustainable and in line with London Living Wage requirements.
- THH advocates the use of ethical trading and where appropriate specifies the use of ethical products such as 'fair trade'.

Our policies are reviewed periodically to ensure that they reflect best practice and to mitigate against risks.

Due diligence in the direct employment and engagement of workers

As described above, our recruitment and selection policy and temporary and agency workers policy together set out a clear system of engagement of workers across our direct workforce.

Typically, all direct recruitment takes place in line with our established procedures and involves interviews with candidates. During the Covid-19 pandemic and in future, we expect that video interviewing to continue, alongside more conventional in-person interviews. Offers of employment are made conditionally subject to the satisfactory completion of the checks highlighted above.

Engaging agency workers is done, in the main, through our managed service provider who use reputable employment agencies to source labour, verifying their practices before we accept workers from them. Where we go outside of our managed service provider, and where we engage recruitment consultants to assist with direct-to-employment recruitment campaigns, we will be improving our practices to ensure that similar checks on the agency/agencies used are implemented.

Employees are provided with clear statements of employment particulars before or on day one of their employment, and temporary workers are provided similar statements regarding their assignment.

THH recognises three trade unions (Unison, the GMB and Unite) and holds a bimonthly scheduled meeting with them through which any issues of concern for staff may be raised. We also have self-organising staff networks through which staff may raise any concerns, including Women's Network, LGBT+ and a Mental Health First Aid Network. We also offer staff 24/7 confidential and free access to an Employee Assistance Programme, which can encourage the reporting of concerns.

Due diligence in the provision of services

As a social housing provider active in community work across Tower Hamlets, we are well placed to identify signs of modern slavery and human trafficking, and as such we place value on the training our front-line employees receive to help them spot issues when going into homes and meeting residents and customers. Staff who are in contact with our residents and service users are trained to identify any safeguarding issues, which includes indicators of forced labour and exploitation, and to comply with the referral process to ensure that incidents of this nature are reported. We have a dedicated member of staff who then makes referrals and works with relevant agencies such as social services and the police.

4. Risk assessment and management

THH has a comprehensive approach to risk management, with our overall corporate risk register regularly reviewed by the executive and senior management teams and reported to/overseen by our board.

Risks in the supply chain

Every contract in place has a designated contract manager who is responsible for monitoring contract risks and performance including those of the supply chain.

Risks in direct employment and engagement of workers

Our workforce is employed solely within the UK and most of our employees are UK nationals. Our business is delivered wholly within the UK.

Our transparent pay arrangements and commitment to the living wage helps us to ensure that our labour is engaged at realistic wages in compliance with the UK's minimum wage legislation.

We have an active record of all employees who have time-limited permission to work in the UK and will work proactively with them in the lead up to the expiry of their permissions to take the appropriate steps to ensure continued compliance with our legal obligations. This now includes our employees who are EU/EEA nationals, whom we have proactively engaged with to provide guidance and support in applying for Settled Status or Partially Settled Status, as

applicable in their situation. We hold a visa sponsorship licence for the employment of non-UK/Irish nationals, which is directly managed by our head of people services and deployed as appropriate in line with prevailing legislative requirements.

Our managed service provider provides assurance that agencies are vetted, and we are reviewing all agency use outside of our managed service provider to ensure that robust arrangements are in place.

5. Key performance indicators to measure effectiveness of steps being taken

Direct employment/engagement of workers

We do not currently track any performance indicators from the perspective of modern slavery. We will review our position over 2021-22 to ensure that we identify the existing indicators that can be used to track our performance and identify any new indicators that need to be monitored.

6. Training and safeguarding

To ensure a high level of understanding of the risks in our business, we have reviewed our safeguarding and whistleblowing policies to include reference to modern slavery issues. We refreshed our safeguarding training in June 2020, so all relevant staff are aware of requirements, how to identify issues and where to report these.

THH launched a new learner management system, the Hive Academy, in June 2020, with safeguarding children and safeguarding adults as mandatory for new starters and readily available to all staff. These modules equip staff with an awareness of safeguarding requirements, including knowledge about child trafficking and how to identify issues and where to report these.

We are currently investigating and reviewing a course that is specifically dedicated to modern slavery and human trafficking. Once confirmed that this course is suitable, we will launch it and make it readily available to all staff.

THH has an adults and children's safeguarding policy and procedure which is reviewed every three years and is easily accessible on the intranet. Staff are regularly reminded of the policy and processes in place, so that they can report any safeguarding concerns. Staff that work directly with residents receive more in-depth training, so that they are equipped to identify and refer any safeguarding concerns.

7. Monitoring and review

This statement constitutes our modern slavery and human trafficking statement for the financial year ending 31 March 2021. This statement was endorsed by our executive management team, and approved by our board on 8 April 2021, and will be reviewed annually as part of our internal controls.