



Modern Slavery Act 2015

Modern slavery and human trafficking statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Prosperity Housing Groups' slavery and human trafficking statement for the financial year ending 2020.

Organisational structure

Prosperity Housing Group is a Community Interest Company that provides supported accommodation within a therapeutic environment for young people. We provide housing, health social care and support services across The West Midlands and beyond.

Our supply chains

We are in the process of mapping our supply chain in order to assess particular industry/sector and geographical risk.

Our policies on slavery and human trafficking

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.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have put in place a designated Modern Slavery and Human Trafficking Policy. Our Modern Slavery and Human Trafficking Policy demonstrates 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.

Prosperity Housing Group operates the following policies:

Modern Slavery Policy - Prosperity Housing Group policy sets out the steps we will take to prevent modern slavery and our commitment to acting ethically and with integrity in all our business relationships.

Employee Code of Conduct - Prosperity Housing Group strives to maintain the highest standards of employee conduct and ethical behaviour in delivering our services and managing our supply chain. The Code of Conduct sets out the behaviours expected of our employees when representing Prosperity Housing Group.

Procurement - Prosperity Housing Group is committed to ensuring that its suppliers adhere to the highest standards of ethics as part of the procurement process. Suppliers are required to demonstrate that they provide safe working conditions, treat employees with dignity and respect and comply with relevant employment legislation.

Recruitment - Prosperity Housing Group will undertake all relevant pre-employment checks prior to staff being employed. We will carry out fair and transparent recruitment processes and will ensure our recruitment agencies comply with these requirements in the provision of agency staff.

Open Door Policy - Prosperity Housing Group is committed to the highest standards of quality, probity, openness and accountability and as part of this commitment provides a confidential reporting process for employees to report serious concerns about any aspect of our work which includes abuse or neglect of vulnerable people.

Safeguarding - Prosperity Housing Group is committed to helping adults and young people live their lives free from abuse, harm or intimidation. Our Safeguarding policies for adults cover modern slavery (encompassing slavery, human trafficking, forced labour and domestic servitude) and set out the robust practices which should be followed and the responsibilities of employees in preventing the abuse/ mistreatment of adults and children we work with.

Fairness - Prosperity Housing Group aims to make fairness something we live by, recruit by and measure by. It is part of our moral compass. We are committed to developing an organisational culture, which values people as individuals, recognising the contribution each person can make.

We will treat all people fairly and with respect, recognising and responding to their individuality.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we will implement the following actions to mitigate the risk of slavery or human trafficking in the delivery of its services and supply chain:

- All existing suppliers will be asked to provide evidence of compliance with the principles of the Modern Slavery Act. Organisations with a turnover of more than £36 million will be required to provide a copy of their Slavery and Human Trafficking Statement
- The tendering of new contracts will include an obligation that suppliers comply with the Modern Slavery Act
- To ensure an understanding of the potential risks of modern slavery and human trafficking in delivering our services and managing our supply chain, we will provide training to relevant members of staff.
- Where appropriate we will include reference to the Modern Slavery Act 2015 in our policies and procedures.

This statement will be reviewed and updated annually.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.

- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we intend to provide training to our staff. We also require our business partners to provide training to their staff and suppliers and providers.