

## Anti-slavery and human trafficking statement 2016-17

### ORGANISATION’S STRUCTURE

New Charter Housing Trust Ltd is a provider of social housing and related services in the social housing sector. We are the parent company of the New Charter Group (the Group). The Group includes:

• New Charter Homes Ltd	• Gedling Homes
• Aksa Housing Association Ltd	• New Charter Building Company Ltd
• Threshold Housing Project Ltd	• Great Neighbourhoods
• Family Support Charity	• Cavendish Property Developments
• Quest Media Network Ltd	

The Group has over 900 employees and operates in the North West and East Midlands of England.

### OUR BUSINESS

The Group’s business is primarily centred around the provision of social housing and associated services this includes but is not limited to:

- Management & letting of properties
- Development of new homes
- Repair and maintenance of housing stock & estates
- Revenue collection
- Money and welfare advice

In addition the Group also:

- Provides charitable donations to individuals and groups
- Supports victim of domestic abuse
- Supports vulnerable and/or client groups from disadvantaged backgrounds
- Supports the provision of a community newspaper and radio service

### OUR SUPPLY CHAINS

The nature of our work means we engage with a diverse range of private and public sector organisations from local authorities, NHS trusts and the Police to local businesses and tradespeople.

We have introduced a requirement for suppliers that they do not engage in any activity that is contrary to the Act and we are strengthening our approach to Procurement by undergoing a full review of existing practices.

We will continue to enhance the assurances we seek from supply chain members as to their avoidance of modern slavery and human trafficking.

## **ANTI SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT**

We have zero tolerance to slavery and human trafficking and are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. You can view our Policy on our website [www.newcharter.co.uk](http://www.newcharter.co.uk)

## **RISK MANAGEMENT AND DUE DILIGENCE TO PREVENT SLAVERY AND HUMAN TRAFFICKING**

Among the policies that we consider give us strength in avoiding modern slavery or human trafficking under the Act in our businesses are:

<ul style="list-style-type: none"><li>• Code of conduct<ul style="list-style-type: none"><li>• Safeguarding</li><li>• Health &amp; Wellbeing</li></ul></li></ul>	<ul style="list-style-type: none"><li>• Financial Regulations (inc Contract Standing Orders &amp; scheme of delegation)</li></ul>
<ul style="list-style-type: none"><li>• Recruitment &amp; selection</li></ul>	<ul style="list-style-type: none"><li>• Whistleblowing</li></ul>
<ul style="list-style-type: none"><li>• Equality &amp; Diversity</li></ul>	<ul style="list-style-type: none"><li>• Anti-bribery</li></ul>
<ul style="list-style-type: none"><li>• Fraud</li></ul>	<ul style="list-style-type: none"><li>• Anti-money Laundering</li></ul>

The Group has dedicated in-house teams responsible for:

**HR** - our HR team is responsible for ensuring our recruitment and employment practices including associated policies & procedures are fair and compliant with current legislation. We offer a range of employee benefits along with generous terms & conditions to ensure we have a happy, healthy and engaged workforce. The Group works closely with trade unions and has a well-represented employee forum.

**LEGAL** - our legal team is responsible for ensuring the Group operates within all applicable laws and works closely with departments across the Group advising on issues such as Housing Management, contracts and development.

**GOVERNANCE & RISK** - our governance & risk team is responsible for ensuring the Group operates in compliance with its constitutional documents, policies & procedures and regulatory requirements. We maintain a comprehensive risk management framework and work closely with our Internal Auditors KPMG LLP.

## **TRAINING AND CONTINUING VIGILANCE**

We have discussed the Act, its purpose and the Group's attitude to it at a Group board meeting. We have had a project group dedicated to considering where the risk of modern slavery or human trafficking may arise in parts of the Group's businesses. The learning has been shared with senior managers. The policy has been communicated to all employees and training will commence in 2017 - 18.

## **FURTHER ACTIONS TO PREVENT SLAVERY AND HUMAN TRAFFICKING**

During 2017-18 the Group will further strengthen its approach to combatting slavery and human trafficking by:

- Clearly communicating our expectations in relation to the prevention of slavery and human trafficking to our suppliers, contractors and business partners and the implications should these expectations not be met.
- Continuing to raise awareness and understanding of the risk of slavery and human trafficking across the organisation.
- Completing the Procurement review and implementing any recommendations.
- Commencing a training programme for employees.

This Statement has been approved by the Group board of directors and is made pursuant to section 54(1) of the Modern Slavery Act 2015.

**Fay Selvan - Chair  
New Charter Group**