

# Modern Slavery Statement 2017-18

## POTENTIAL MODERN SLAVERY VICTIMS



ONE THIRD OF  
VICTIMS ARE MALE



TRAFFICKED INTO  
LABOUR EXPLOITATION



47% INCREASE  
SINCE 2017

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. This statement relates to activity during the financial year April 2017 to March 2018.

Accord is committed to ensuring that there is no modern slavery in any part of our business or our supply chains. We are committed to acting ethically and with integrity in all our business relationships and enforcing effective processes and controls to ensure slavery is not taking place anywhere in our supply chains.

Accord Housing Association is a registered Housing Association and is regulated by the Homes and Communities Agency, Care Quality Commission and Ofsted. We provide housing, health, social care and support and community-based services to over 80,000 people across the Midlands and beyond.

### Our supply chain

We are in the process of mapping our supply chain in order to assess particular industry/sector and geographical risk. This work is being led by our Procurement Officer, Will Sheppard [will.sheppard@accord.org.uk](mailto:will.sheppard@accord.org.uk) and will cover the entire scope of our business.

## Responsibility

The Chief Executive will take lead responsibility for the development and implementation of the Association's anti-slavery initiatives as part of procurement. We also have a Board level modern slavery champion.

## Relevant policies

The Association operates the following policies:

**Modern Slavery Policy** - Accord's 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** - We strive 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 staff when representing Accord.

**Procurement** - Accord 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 staff with dignity and respect and comply with relevant employment legislation.

**Recruitment** - Accord 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.

**Speak Up Policy** - Accord is committed to the highest standards of quality, probity, openness and accountability and as part of this commitment provides a confidential reporting process for staff to report serious concerns about any aspect of our work which includes abuse or neglect of vulnerable people.

**Safeguarding** - Accord is committed to helping adults and children live their lives free from abuse, harm or intimidation. Our safeguarding policies (for adults and children) 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 staff in preventing the abuse/mistreatment of adults and children we work with.

**Fairness** - Accord 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.

**Learning and Development** - Accord is a learning organisation that strives to meet the learning and development needs of all our people. Modern slavery is touched upon as part of our core training which all new staff are required to complete. Accord is committed to introducing specific modern slavery training which will be mandatory for key staff as identified through a training needs analysis.

## Due diligence

Going forward Accord will implement the following actions to mitigate the risk of modern slavery or 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 modern slavery statement. Organisations with a turnover of less than £36 million who don't have their own statement will be required to sign up to ours.

- 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 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 has been approved by the Board of Accord Housing Association, who will review and update it annually.

#### **Compliance**

Responsibility for ensuring compliance with the modern slavery statement and policy will sit with Accord's respective Directors and Heads of Service.

The Accord approved supplier list will be developed during 2017-18. Once set up it will be revisited by Procurement and updated on an annual basis. It will be the responsibility of the Directors/Heads of Service post-simplification to ensure that they and their teams are aware of and are applying the modern slavery policy and to conduct spot checks. This will include ensuring that all suppliers are signed up to Accord's or have submitted their own modern slavery policies.

Directors/Heads of Service will also be responsible for ensuring that actions in the implementation plan, relevant to their parts of the organisation, are completed. Accord's internal Audit team will be responsible for checking compliance across different parts of the organisation. A standard annual audit will be carried out focusing specifically on modern slavery. In the first instance it will be the Regeneration and Assets parts of the organisation that will be audited.

A short report detailing progress against the implementation plan will be submitted to Accord's Communities Board every six months.

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