

## **MODERN SLAVERY STATEMENT**

The Modern Slavery Act 2015 (the Act) requires organisations supplying goods or services with a turnover of above £36m to prepare and publish an annual Modern Slavery Statement.

### **Our Business**

Orwell Housing Association (Orwell) is a housing association working in three distinct areas; the renting of affordable housing, the delivery of care and support for older people, younger persons and those with learning disabilities and the delivery of development and repair services for both itself, other housing associations and local authorities. Orwell has a wholly owned subsidiary; Orwell Homes Limited which undertakes development on behalf of the parent company and builds homes for sale.

### **Our Supply Chain**

We do not have any supply chain outside of the United Kingdom.

Orwell and Orwell Homes Limited do not trade directly with any other country and where possible procure all labour and materials locally. Our most significant supply chain is through the delivery of materials for both programmed works, day to day repairs, new build development and equipment and materials used by the Estate Management team. These materials and associated services will either be procured directly in the UK or through Eastern Procurement Limited, who when tendering services on behalf of Orwell, are required to ensure that all suppliers are conscious of their obligations under the Modern Slavery Act 2015.

In addition to these procedures, we shall only allow inclusion on to our supplier list if contractors and suppliers have signed a declaration that they are not involved in modern slavery or human trafficking and are fully compliant with the Modern Slavery Act 2015.

### **Our policies to resist modern slavery and human trafficking**

We have reviewed our existing policies and procedures and we are confident that our policies promote good behaviour among our colleagues at work and within our supply chain. Our policies and procedures are kept under review to make sure they reflect the changing shape of the Association and the Group as a whole and of the needs of the people and the communities which it serves.

Among the policies we consider give strength in avoiding modern slavery or human trafficking in our business are:

- Anti-Bullying and Harassment policy
- Capability policy
- Corporate Social Responsibility policy
- Customer Promise
- Disciplinary policy
- Equality and Inclusion policy
- Flexible Working policy

Gifts and Hospitality policy  
Grievance policy  
Health and Safety policy  
Lone Working policy  
People Promise  
Recruitment and Selection policy  
Risk Assessment policy  
Risk Management policy  
Safeguarding Adults policy  
Safeguarding Children policy  
Stress and Wellbeing policy  
Support and Supervision policy  
Violence at Work Prevention policy  
Whistle Blowing policy

### **Recruitment of Selection**

Orwell employs some 700 people and before confirming employment every successful application is checked for proof for eligibility to work in the UK. This by production of a valid passport, or by other means such as a birth certificate.

For roles that require DBS clearance each role clearly states the requirement for DBS and the level of DBS associated with that role. References are also taken for every potential new starter covering two years full career history and a minimum of two references.

### **Our ongoing commitment to the Modern Slavery Act 2015**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or any part of our business. Our commitment is to act ethically and with integrity in all our business relationships and to implement effective systems and controls to ensure slavery and human trafficking is not taking place. We are further committed to making sure that our properties are not used to accommodate the work of human traffickers or to detain others for human servitude.

### **Monitoring Effectiveness**

The main method of monitoring effectiveness within the supply chain will be the pre-qualification criteria for suppliers which includes a requirement to have measures in place to minimise the possibility of modern slavery in their business and supply chain.

### **Governance**

Responsibility for compliance with the Modern Slavery Act rests with our Board and across the whole Leadership Team. The Leadership Team take responsibility for implementing the policy and its objectives and shall provide adequate resource and investment to ensure that slavery and human trafficking is not taking place within the organisation.

**Declaration**

This statement is made pursuant to Section 54(1) of 'the Act' for the financial year ending 31 December 2019 and has been approved by the Association's Board.

Signed by

A handwritten signature in black ink, appearing to read 'Wendy Evans-Hendrick', with a long horizontal flourish extending to the right.

**Wendy Evans-Hendrick  
Chief Executive**