

Salvation Army Housing Association (Saha) Modern Slavery and Human Trafficking Statement

Saha is proud of the steps we take to tackle modern slavery and human trafficking both in our supply chains, and in terms of the support we provide to people who have experienced or are at risk of homelessness. We are committed to improving our practices and procedures each year

Saha understands that it has a responsibility to take a robust approach to slavery and human trafficking and as such takes a zero tolerance approach to slavery and human trafficking and expects all those in its supply chain and contractors to comply with its values.

In addition to its own Modern Slavery and Human Trafficking Statement, Saha also adheres to its parent company, The Salvation Army's Modern Slavery Statement and relevant policies and practices.

Our Business and Organisational Structure

Salvation Army Housing Association (Saha) is a Registered Provider that started developing supported housing and services in the 1970's. Originally established by The Salvation Army, the Association is an independent organisation and has grown into a diverse specialist provider of accommodation and support services across England.

The Association is registered as a Community Benefit Society with charitable status under the Co-operative and Community Benefit Societies Act 2014 (registration no. 15210R) and is also registered with The Regulator of Social Housing (registration no. LH2429). It operates nationally in 80 local authorities across England and has four main business areas of operation; General Needs Accommodation, Older People's services, Directly Managed Supported Housing services and Agency Managed services.

Responsibilities

Saha is constantly working on identifying how modern slavery and human trafficking may affect our customers. We come across a wide range of customers who reflect a diverse variety of backgrounds and needs. Saha recognises that isolated residents and people with learning difficulties may be particularly vulnerable or at risk. Saha have an extensive and robust framework of policies, procedures and contractual requirements in place which contribute towards the prevention of slavery or human trafficking within our organisation and our supply chains. Effective implementation of these policies and procedures ensures Saha conducts business in an ethical and transparent manner. All policies are reviewed by the Executive and Senior Management team and key policies are approved by the Board/Committee on a rolling basis in response to audit, statutory or regulatory changes and feedback from customers and partners.

Procurement and Supply Chain

The Association is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business. We manage projects and procurements where services and products are sourced from suppliers. Most of these products are not sourced by us directly but are sourced by our contracted suppliers of services, goods and

works. As an organisation that does not wish to work with any business knowingly involved in slavery or human trafficking in any part of its operations, we take the following steps:

- Require new suppliers to sign a declaration that they are not involved in slavery or human trafficking and have not been subject to any investigation in connection with any offence involving slavery or human trafficking
- Incorporate provisions in our contract and sub-contract documentation requiring our suppliers to take appropriate steps to ensure that there is no slavery or human trafficking in their supply chains
- Include within all tender documentation instructions that we expect all suppliers to comply with the Modern Slavery Act
- Work collaboratively with suppliers identifying those procured goods/services which may carry the highest risk of modern slavery within their supply chain and requiring our suppliers/contractors to confirm the steps taken to ensure there is no slavery or human trafficking in their supply chains
- A whistleblowing policy for all employees

Saha has robust procurement processes in place meaning it only engages with reputable suppliers and contractors who adhere to appropriate legislation, regulation and practices.

Recruitment

As an equal opportunities employer Saha has clear recruitment procedures and processes including Right to Work checks for all permanent and interim employees. We ensure that where agency workers are used, these are only sourced from reputable employment agencies. Using this approach, we seek to avoid inadvertently engaging those who present as looking for work for themselves, but who are actually 'controlled' by others. We also ensure that these partners apply HR good practices and processes including Right to Work checks and Saha has access to these records and carries out regular audits to ensure they are up to date and accurate.

- All new Saha employees receive induction training on equality and diversity which seeks to recognise and work with vulnerable people and children in our communities.
- Specialist training is provided for all front-line employees in safeguarding, domestic abuse and violence services, including identifying potential cases of modern slavery and human trafficking and how to report them.

Code of Conduct

All Saha managers and employees must adhere to a Code of Conduct which clearly sets out expected standards of behaviour. The Code requires employees to act with honesty, integrity, report misconduct and take responsibility for safeguarding.

Safeguarding

All employees are expected as a minimum to complete our mandatory e-learning module within the required timeframe. Further safeguarding training is mandatory for all client-facing employees. We monitor compliance via our People Services Team (HR).

Investigations/Due Diligence

Members of the Senior Management Team are responsible for investigations and due diligence in relation to known or suspected instances of slavery or human trafficking

Future Action

Saha will continue to take action and improve its procedures in relation to modern slavery to mitigate risk and will continue to raise awareness and deliver training to new and existing employees and will extend this to its suppliers and contractors, where appropriate.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps that Salvation Army Housing Association (Saha) has taken and continues to take to ensure that slavery and human trafficking is not taking place within the Association or its supply chain.

This statement has been approved by the Association's Group Board.

A handwritten signature in black ink, appearing to read 'L388hea'.

Lynne Shea

Chief Executive

September 2023