
Modern Slavery and Human Trafficking

Policy Statement

Organisational Development



Version	1
Issue Date:	December 2017
Review Date:	December 2018
Access Ref:	
Staff affected:	All
Approved by:	Executive Team
Lead Officers:	Organisational Development

TABLE OF CONTENTS

INTRODUCTION	
ORGANISATION STRUCTURE AND SUPPLY CHAIN	
RELEVANT POLICIES.....	
DUE DILIGENCE	
PERFORMANCE INDICATORS	
TRAINING.....	
RAISING AWARENESS PROGRAMME.....	
BOARD MEMBER APPROVAL	

Introduction

This statement sets out Trident Group's actions to understand all potential modern slavery risks related to its business, and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2017 to 31 March 2018.

As part of the housing, care and support sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Trident Group:

- Trident Group comprises a housing association (Trident Housing Association), a care and support charity (Trident Reach the People Charity) and a commercial arm (Trident Star). The housing association is an innovative housing provider managing and providing homes to 6,000 people across the Midlands. Trident Reach provide care and support to many of the most vulnerable societal groups across the region. Trident Star is the entity carrying out any commercial activities on behalf of the housing association and charity.
- With over 50 years of serving disadvantaged neighbourhoods, the Group places a social investment ethos and collaborative community working at its core, enabling it to remain independent.

Countries of operation and supply

Trident Group operates in the East and West Midlands of the UK, delivering the services listed above.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- The Group's Executive Team and its Directors are responsible for assessing the risk assessment process in relation to the directorate's specific operations.

High-risk activities

We do not believe any of the Group's activities to be at risk of slavery or human trafficking:

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** The Executive Team is responsible for ensuring that all staff adhere to policy and are informed of the Group's position regarding slavery and human trafficking. The Organisational Development department is responsible for updating the aforementioned policy and for the review and monitoring of this, in conjunction with the Executive Team.

- **Risk assessments:** We require all senior managers to carry out risk assessments of their services to determine our risk exposure. We update our risk register to ensure that any risks are appropriately flagged, mitigated and monitored.
- **Investigations/due diligence:** The Executive Team will be responsible for ensuring that the appropriate individuals are assigned for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- **Training:** The organisation will ensure that training takes place either directly within the company, or with suppliers and others, to better understand and respond to the identified slavery and human trafficking risks.

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact a member of Organisational Development or Employee Forum.
- **Employee code of conduct** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour in its operation.
- **Supplier/Procurement code of conduct** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment and Selection policy** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- evaluating the modern slavery and human trafficking risks of each new supplier.

Performance indicators

The organisation has reviewed its key performance indicators (KPIs). As a result, the organisation is:

- requiring all staff to have completed training on modern slavery by March 2018; developing a system for supply chain verification expected to be in place by March

2018, whereby the organisation evaluates potential suppliers before they enter the supply chain; and

- reviewing its existing supply chains expected to be completed by March 2018, whereby the organisation evaluates all existing suppliers.

Training

The organisation requires all staff within the organisation to complete training on modern slavery.

The organisation requires all staff to sign up to one of a number of training sessions that are being run and complete an online training course by March 2018.

The organisation's modern slavery training covers:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Raising Awareness programme

As well as training staff, the organisation will raise awareness of modern slavery issues by putting up posters across the organisation's premises and posting this information on SharePoint.

The information explains to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

REFERENCES

Code of Conduct
Whistleblowing Policy
Recruitment and Selection Policy

LEGAL FRAMEWORK

Modern Slavery Act 2015

MONITORING AND REVIEW

HR will be responsible for the monitoring and periodic review of the Modern Slavery and Human Trafficking Policy Statement to ensure the requirements are being met.