

# Modern Slavery and Human Trafficking Statement

June 2016



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### 1. INTRODUCTION

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Fortis Living recognises that Modern Slavery and Human Trafficking remains a hidden blight on our global society, which also includes well-developed countries like the United Kingdom. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. We clearly recognise our obligations in that regard and, together with our partners, we have taken appropriate steps in order to identify, target and prevent modern slavery and human trafficking from occurring. As an organisation, we are always keen to examine the effectiveness of our approach so that we can continue our good practice over the course of the year. This statement outlines the steps we have taken in order to achieve this objective.

### 2. OUR STRUCTURE

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Fortis Living is a not-for-profit housing association based in Worcestershire. We provide over 15,000 homes primarily across Worcestershire, Herefordshire and Gloucestershire. With a turnover of over £75 million a year, we are one of the largest housing providers in the West Midlands.

Guided by our vision of providing ‘better homes and better lives’ in local communities, we adhere to ethical business practices which are aligned to our strong social purpose. Our team work closely with our customers and stakeholders to understand and respond to local needs and to help create successful, resilient and safe local communities. Going beyond traditional social housing provision, we also have a strong development pipeline and build a range of tenures from affordable rent to market sale.

For more information about who we are, our vision and values as well as our Board and Executive Management Team can be found by [clicking here](#).

### 3. OUR BUSINESS

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Fortis Living Group includes: Fortis Living, Festival Housing Ltd, Worcester Community Housing Ltd and Fortis Property Care. Fortis Property Care is a subsidiary of Fortis Living and undertakes a wide range of repair and improvement activities. With a workforce of over 150 tradesmen and a team of office-based support staff, Fortis Property Care has a turnover in excess of £22 million and

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maintains all properties owned by Fortis Living as well as carrying out work for partner organisations in South Worcestershire.

### 4. OUR SUPPLY CHAINS

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As a large business based solely in the UK, we manage projects and procurements where services and products are sourced from a wide range of national suppliers. As a UK based business, we have concluded that our exposure to the risk of Modern Slavery and Human Trafficking is relatively low. However, that does not mean that we are complacent and as part of our ongoing process to identify and monitor risks we have identified that one of our key areas of risk lies in our relationships with supply chains and contractors. To manage this risk, we require third parties to acknowledge our commitment to combat slavery and human trafficking by inserting relevant clauses into our agreements.

Additionally, we aim to share our training and awareness on the issues pertaining to the Modern Slavery and Human Trafficking with our partners and contractors within those supply chains.

### 5. OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

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We recognise that Modern Slavery and Human Trafficking can occur in the context of housing and therefore alerting all our staff to that risk is crucial to our approach. In addition to having relevant safeguarding policies and procedures guiding our front line staff, we are also committed to ensuring that there is no Modern Slavery and Human Trafficking in our supply chains or in any other part of our business. Our Financial and Procurement Regulations reflect this commitment very clearly by prescribing effective systems and controls that eliminate conditions where modern slavery and human trafficking can occur. Following expert advice, we are always keen to review those procedures in order to make them robust and suitable to current circumstances.

### 6. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

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Additionally, we have taken steps to ensure that our suppliers' anti-slavery and human trafficking policies and practices are robust and satisfy current legislation. These steps include:

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- Requiring new suppliers to declare that they are not involved in modern slavery or human trafficking and have not been subject to any investigation in connection with any offence involving slavery or human trafficking
- Provisions in our template contract documentation requiring our suppliers to take appropriate steps to ensure that there is no slavery or human trafficking in their supply chains and that they appreciate and mitigate risks appropriately
- Ensuring that they respond to training opportunities and awareness raising in that area
- Where possible we build long standing relationships with local suppliers and business partners highlighting our expectations of ethical business behaviour
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers

### 7.SUPPLIER ADHERENCE TO OUR VALUES

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We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values. All our Directors are responsible for compliance in their respective departments and for their supplier relationships.

### 8.TRAINING

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To ensure a high level of understanding of the risks of Modern Slavery and Human Trafficking in our supply chains and our business, we provide training to relevant members of staff and offer it to our business partners across supply chains. All Directors have been briefed on the subject.

### 9.OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

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We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that Modern Slavery and Human Trafficking is not taking place in any part of our business or supply chains:

- Completion of regular internal and external audits by Mazars.
- Use of labour monitoring and payroll systems

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- High levels of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.