

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

April 2015 - March 2016

1. INTRODUCTION

Symphony Housing Group is a Registered Provider of Social Housing in England, whose principal activities are the provision of affordable rented accommodation, the provision of care and support services and the development of low cost home ownership schemes. We are the largest affordable social housing provider based solely in the North West of England, with headquarters in Liverpool and Manchester.

A partnership of nine organisations, who together own and manage 41,000 properties in the region, Symphony is a key partner and investor in our neighbourhoods and communities. The Group's turnover for 2015/16 was £189.5m.

Symphony Housing Group's member organisations are; Atrium, Cobalt Housing, Contour Homes, Contour Property Services, Hyndburn Homes, Hyndburn Homes Repairs, Liverpool Housing Trust, Peak Valley Housing Association and Ribble Valley Homes. This Statement applies to those organisations.

Symphony is absolutely committed to working to prevent slavery and human trafficking in its corporate activities and within its neighbourhoods, and to ensuring that its supply chains are free from slavery and human trafficking. This Statement sets out what policies are currently in place to prevent modern slavery and human trafficking related to our business, and the additional steps we have taken to ensure that there is no slavery or human trafficking in our own business and in our supply chains. The Statement also demonstrates what else we intend to do over the coming year, to continue to prevent modern slavery occurring.

2. OUR VISION

Our shared vision is to be a strong, diverse partnership that makes the most of our individual and combined strengths to deliver real and lasting benefits for our tenants and for the wider communities in which we work.

One of our values that supports this vision is integrity - we will do what we say we will do, being open and transparent in our dealings with others.

We are pleased to be publishing our first Modern Slavery and Human Trafficking Statement covering April 2015 – March 2016, in the spirit of both integrity and transparency.

3. OUR PROCUREMENT PROCESS

Any supplier or sub-contractor that Symphony chooses to work with is subject to a comprehensive assessment process prior to their appointment, to ensure they meet our criteria. All contracts are tendered in accordance with our Standing Orders and Financial Regulations. Symphony recently updated its Procurement Policy, to take account of the Modern Slavery Act 2015. As part of our procurement process, we now ask what bidders have done to ensure their own business and their supply chain is free of modern slavery and we may decide not to include them in a procurement exercise if they cannot evidence any efforts they have made to do this. Tenders now include the requirements for suppliers and contractors to demonstrate their capability to meet the requirements of this policy. Those organisations who cannot demonstrate that their approach to the Modern Slavery Act meets the requirements of the Group upon assessment will be excluded from further involvement in a tender process.

In terms of our development work, Symphony has revised and updated its Development brief to consultants and contractors, which now includes a section on compliance with the Modern Slavery Act.

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Over the next year, we intend to work more closely with our procurement consortia, so that we develop joint approaches to tackling modern slavery.

4. OUR MODERN SLAVERY AUDIT

As part of drawing up this Statement, we carried out an audit of our key suppliers and contractors. In addition to learning more about their practices, the aim of the audit was also to raise their awareness of the requirements of the Act and to emphasize the importance Symphony places on being able to evidence compliance. This audit has only recently been completed, so we have not had the opportunity to analyse the results in full. These results will be fundamental in helping us to assess the risk of modern slavery in our supply chains, to give us comfort that our partners are responding to the Act and that they can demonstrate that their own supply chain is free from modern slavery.

377 organisations completed our audit; key findings:

- 16% of those responding are required to produce their own Modern Slavery Statement
- 92% said they were aware of the Modern Slavery Act 2015
- Actions being taken to respond to the Act include 65% reviewing policies, 26% reviewing their tendering process, 56% raising staff awareness, 27% auditing their suppliers and 33% producing their own Statement
- 80% of responding organisations said they pay a Living Wage to all employees

Over the next year, Symphony will ask organisations to evidence what they told us in this audit, so that we are confident the risk of modern slavery occurring in their organisations is being mitigated. Where relevant, we will request a copy of their Modern Slavery Statement, to find out how they have responded to the Act and what they plan to do over the next year. We will also contact key partners who haven't responded to the audit and ask them to take part.

We acknowledge that the level of risk posed by companies to Symphony can be different to the risk posed to individuals likely to be trafficked or to be victims of forced labour. In other words, we recognise that it is not just about our biggest suppliers or contractors, or those that we spend more money with, as they may be more likely to be responding to the requirements of the Act, particularly if they have to produce their own Modern Slavery Statement. It is also about the smaller companies we work with, who have fewer resources to tackle modern slavery, but could still pose a risk in terms of their employment practices or supply chain.

5. OUR POLICIES

Symphony operates the following policies that cover its approach to preventing and tackling modern slavery risks and human trafficking both within the organisation and in its communities:

- Symphony holds the [Living Wage Foundation](#) accreditation, and officers must ensure that contractors appointed support and comply with the requirements of the Foundation to enable the Group to maintain its accreditation
- Symphony's Valuing Difference statement demonstrates our commitment to our legal and regulatory responsibilities, which includes meeting the requirements of the Modern Slavery Act 2015, and to deliver and promote equality of opportunity, access and outcomes for all
- Symphony's offers of employment are made conditional upon receipt of satisfactory references, confirmation of eligibility to work in the UK (birth certificate/ passport), and confirmation of national insurance number (citing of a letter from HM Revenue & Customs or a wage slip from a previous employer) amongst other criteria

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- Symphony has recently updated its Safeguarding Adults at risk and Safeguarding Children policies to reflect the Modern Slavery Act 2015. Both policies now recognise that where either an adult or child are at risk of, or a victim of human trafficking, forced labour or domestic servitude, they will be referred and dealt with as safeguarding cases to the relevant local authority, in the same way as other forms of abuse. The roll out of this policy will include staff training, which will raise awareness of Modern Slavery
- Symphony policies are subject to an Equality Impact Assessment when they are either being developed or reviewed, and as part of that process, implications in relation to the Modern Slavery Act are considered.

6. OUR STAFF AND CONTRACTORS

We have delivered training to our staff, to raise awareness of the Modern Slavery Act, including what colleagues can do if they suspect Modern Slavery is present either within one of our communities or within a partner organisation, and what external help is available, for example through the Modern Slavery Helpline.

Over the next year an online training module will be developed for all staff to complete.

The same training will also be delivered to our key contractors, to raise their awareness and to inform them how they should respond to the Act.

Over the next year, we intend to raise awareness within our communities of Modern Slavery, via social media, so that residents are aware of the signs and know how to report it.

We encourage colleagues, subcontractors, suppliers and customers to report any concerns about potential unethical business practices, such as slavery or human trafficking either via our internal whistle-blowing procedures or via the Modern Slavery Helpline.

7. SYMPHONY BOARD APPROVAL

This statement has been approved by Symphony's board of management, who will review and update it annually, and will monitor the actions being taken to prevent its occurrence.

Signed



Name

Dr. Neil Goodwin
Chair, Symphony Housing Board

Date

21/9/2016