



Modern Slavery Statement 2020-21

Introduction

This Statement sets out Salix Homes' commitment to recognising and eradicating modern slavery (encompassing human trafficking, slavery, forced labour and servitude).

As an ethical, social housing provider, Salix Homes takes a zero-tolerance approach to modern slavery and human trafficking, seeking to act with transparency and integrity in all our business transactions.

Salix Homes is committed to implementing and enforcing effective systems and controls to ensure modern slavery, in all its forms, is eradicated throughout our direct operations and wider supply chain.

Salix Homes will not knowingly trade with, support, or work with any business or organisation found to be involved in modern slavery or human trafficking in any way, however remote or indirect.

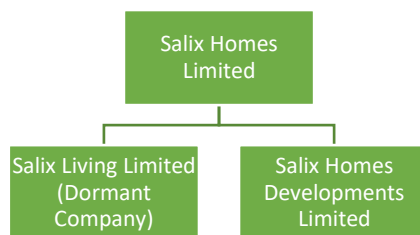
About Salix Homes

Salix Homes is a registered, charitable social housing provider with approximately 7575 homes in our portfolio.

In 2020/21, Salix Homes achieved a turnover of £42.150m

Salix Homes has approximately 288 employees and is an accredited Living Wage employer.

Our structure is set out below:



Salix Homes is the 'parent' company of two subsidiaries which are listed companies. These are :

Salix Homes Developments Limited – a wholly owned subsidiary acting as a property development company.

Salix Living - currently dormant.

Salix Homes' commitment to fairness and equality, challenging the unacceptable and having a positive impact on all those who cross our organisational path is reflected in our values of:

- Be Bold

live • grow • thrive • together

- Be Active
- Be Inclusive
- Be Successful

Our Supply Chain

Salix Homes' supply chain is wide and diverse, from building and maintenance contractors through to suppliers of goods and services for our office functions.

Our current supply chain includes 376 active suppliers for the 2020/21 financial year, with spend at £39m inc.vat. A breakdown of this spend is as follows:



For suppliers with significant annual spend levels, a signed contract is in place in line with Salix Homes' procurement requirements.

Salix Homes is committed to continuously improving our procurement practices in relation to tenders and contracts, to ensure they reflect best practice and legislative requirements and that modern slavery remains a key consideration in all procurement activities.

Policies

Salix Homes has a number of policies and procedures in place which, combined, seek to ensure the risk of modern slavery to our business and supply chain is minimized. These include:

- Whistleblowing Policy
- Safeguarding Policy
- Recruitment and Selection Policy
- Anti-Fraud Policy
- Equality & Diversity Policy
- Attendance Management Policy
- Anti-Social Behaviour, Hate Crime and Domestic Abuse Policy
- Disciplinary Policy
- Health & Safety Policy
- Anti-Money Laundering Policy
- Financial Regulations and Scheme of Delegation
- Employee Code of Conduct and Contract of Employment
- Grievance Policy
- Risk Management Strategy and Framework

Assessment

Salix Homes believes there is a low risk of modern slavery and human trafficking occurring within our operations. Potential risks are mitigated by our policies and procedures, controls built into our business operations and the knowledge, skills and behaviours of our staff.

Due Diligence

Salix Homes seeks to actively mitigate the risk of modern slavery and human trafficking occurring in the delivery of our services and throughout our supply chain by:

Organisation

- Having in place a robust Safeguarding Policy and Procedure.
- Being a member of a number of safeguarding multiagency groups.
- Liaising with community partners to understand and prevent criminal behaviour.
- Offering a range of services to support customers including new and current tenant visits, provision of tenancy support and additional welfare support for vulnerable customers. Such interactions provide opportunities for employees to see customers in their home environment and flag any safeguarding concerns first-hand.
- Having a Tenancy Specialist function tasked with investigating possible fraud; another route to identifying possible modern slavery activities.
- Providing a confidential reporting process for employees, contractors and suppliers to report any serious concerns whilst working with Salix Homes' customers, including the abuse or neglect of vulnerable people.

Employees

- Paying all employees at least the living wage.
- Employing all our employees directly or through a reputable agency.
- Requiring all employees to provide right to work documentation prior to commencing employment.
- Having open and fair recruitment and selection practices.

Suppliers

- Requiring suppliers to confirm that they have their own Modern Slavery statement and or policy in place (should they meet the statutory thresholds).
- Ensuring all tender exercises include the legal requirement for bidders to:
 - confirm that they have their own Modern Slavery statement (if they meet the statutory thresholds) and provide a copy; and
 - accept the inclusion of additional clauses in supplier contracts, confirming that the supplier will take its own steps to eradicate slavery and prohibit the use of forced, compulsory or trafficked labour.

Training

All new Salix Homes employees are required to complete both Adult and Child Safeguarding Awareness e-learning training within six months of commencing employment. The training aims to educate and empower our employees to identify potential risk factors and at risk groups, including signs of exploitation and how to respond to them.

In addition, mandatory Safeguarding Awareness refresher training is provided to all employees on a three yearly cycle.

Effectiveness

Salix Homes recognises the importance of measuring the effectiveness of the risk mitigations put in place.

Our primary source of assurance, in relation to Salix Homes' supply chain, is the procurement evaluation process for suppliers which should demand visibility of supplier/contractor Modern Slavery Statements (where applicable) and/or policies.

Internal auditors are tasked with periodically reviewing Salix Homes' approach to safeguarding.

Our People Services Team maintain records of employee training which provides assurance that key personnel are keeping up to date with latest, best practice developments in relation to modern slavery.

Further Actions

Salix Homes will seek to undertake the following actions to further combat modern slavery and human trafficking:

- Board members and all senior management shall continue to take responsibility for implementing this statement and its objectives and shall provide adequate resources (e.g. training etc.) and investment to ensure that slavery and human trafficking is not taking place within the organisation and/or supply chains.
- All employees will be able to access a copy of this Anti-Slavery and Human Trafficking Statement, alongside a briefing note that provides guidance on how to spot signs of Modern Slavery and Human Trafficking and the process that should be followed to report such incidents.
- All relevant policies will be reviewed to ensure they continue to reflect our commitment to the Modern Slavery Act 2015.
- Reviewing our tender documents and contract terms and conditions to ensure they support our zero tolerance ethos.
- Continue to raise awareness and understanding of the risk of modern slavery and human trafficking across the organisation.
- Introduce ongoing assessments with key suppliers to include what they are doing to reduce the risk of modern slavery in their supply chains.
- Undertaking audits and spot checks of our high-risk areas such as:
 - Procurement
 - Employment
 - Service Delivery

Conclusion

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Salix Homes' Modern Slavery and Human Trafficking Statement for the financial year ending 31 March 2021.

It was approved by our Board on 28 September 2021.

Signed:

A handwritten signature in dark ink, appearing to read "J. Rattle". The signature is written in a cursive style with a horizontal line above it.

– Chair of Salix Homes Ltd

Date: 28 September 2021