



Modern Slavery Statement 2023-24

Introduction

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.

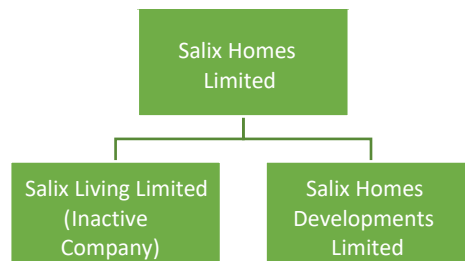
This statement sets out Salix Homes' commitment to recognising and eradicating modern slavery (encompassing human trafficking, slavery, forced labour and servitude).

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 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 the parent organisation for the Salix Homes Group (SHG), which comprises of the following organisations:



Salix Homes Ltd. – Registered as a Community Benefit Society with the FCA - Registration number: 7501. Also registered with the Regulator of Social Housing: 4609

Salix Homes Developments Ltd (SHDL) – Company Number: 10359332

Salix Living Ltd (SLL) – Company Number: 10359220 (currently inactive)

The Registered Office for all organisations is Diamond House, 2 Peel Cross Road, Salford, M5 4DT.

A Registered Provider of social housing since 2015 following the transfer of stock from Salford City Council, Salix Homes (SH) owns and provides housing management related services to around 8,000 homes in Salford, Greater Manchester. The Association has an annual turnover of around £38.9M and employs around 300 people.

Salix Homes' business is primarily centred around the following services:

- Housing and tenancy management services (to a variety of tenure types including general needs, housing for older people, and affordable rent)
- The letting of properties
- The development of new homes
- The repair and maintenance of our housing stock and neighbourhoods
- Rent and financial inclusion advice
- Tenancy sustainment support

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 being:

- Trustworthy
- Successful
- Inclusive

Salix Homes Developments Ltd – is a wholly owned subsidiary of Salix Homes Ltd. It is a non-asset holding entity – established to construct and develop new properties on behalf of the parent.

Salix Living - currently inactive

This statement covers Salix Homes Limited and all of the above subsidiaries.

Responsibility

This statement is approved by the Board of Salix Homes.

The Senior Management Team is responsible for overseeing our anti-slavery activities, led by the Chief Executive Officer and the Company Secretary.

Individual Managers are responsible for the day-to-day implementation of Salix Homes' policies and procedures, ensuring that their teams are aware of their responsibilities in making our activities against slavery and human trafficking effective.

The prevention, detection and reporting of any instances or concerns of modern slavery is the responsibility of all colleagues.

All colleagues are encouraged to raise any concerns at the earliest possible stage.

Risk Assessment and Management

The Senior Management Team is responsible for overseeing our anti-slavery activities, led by the Chief Executive Officer and the Company Secretary.

Individual Managers are responsible for the day-to-day implementation of Salix Homes' policies and procedures, ensuring that their teams are aware of their responsibilities in making our activities against slavery and human trafficking effective.

The prevention, detection and reporting of any instances or concerns of modern slavery is the responsibility of all colleagues.

All colleagues are encouraged to raise any concerns at the earliest possible opportunity. The Salix Homes Group manages risk according to its Risk Management Framework. Risks are managed on an ongoing basis – with risks being regularly reviewed by the Audit & Risk Committee and the Board.

Our Risk Management Framework is subject to external review and scrutiny – by our external Risk and Strategy Advisors and our Internal Auditors. Our risks are externally reviewed to ensure that they are appropriate to the work of the Association and are in line with the expectations of our Regulator.

Currently, there are no areas of the Associations business that are considered to represent a high level of risk of slavery and human trafficking. Potential risks are mitigated by our policies and procedures, controls built into our business operations and the knowledge, skills and behaviours of our staff.

Our Supply Chain

Salix Homes' supply chain is wide and diverse - from building and maintenance contractors through to suppliers of goods and services. The majority of these suppliers are based and trade in the UK.

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

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.

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

1. Having in place an approved and robust Safeguarding Policy and Procedure.
2. Training and awareness sessions.
3. Being a member of several safeguarding multiagency groups.
4. Liaising with community partners to understand and prevent criminal behaviour.
5. 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.
6. Having a Tenancy Specialist function tasked with investigating possible fraud and possible modern slavery activities.
7. 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 colleagues at least the living wage.
- Employing all our colleagues directly or through a reputable agency.
- Requiring all colleagues to provide right to work documentation prior to commencing employment.
- Having open and fair recruitment and selection practices supported by Salix Homes' policies and procedures.

Suppliers

- Requiring suppliers to confirm that they have their own Modern Slavery Statement and 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.

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 as part of the approved internal audit plan.

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.

Training

All new Salix Homes colleagues 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 every two years.

Reporting Concerns

The Salix Homes Group requires all colleagues and contractors acting on our behalf to raise any concerns or suspicions of incidents of modern slavery or human trafficking. In line with our Safeguarding Policy and procedures, colleagues are able to register any concerns with management for further investigation and review.

In the event of a serious concern requiring an immediate emergency response, colleagues may also contact the Police direct by calling 999. They may also contact the Modern Slavery Helpline on 08000 121700 or Crimestoppers on 0800 555111.

Colleagues may also raise any concerns directly with the Chief Executive Officer, any member of the Senior Management Team or the Company Secretary.

No concerns or incidences of modern slavery or human trafficking were reported during 2022/23.

Policies and Procedures

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

- Agency Worker
- Anti-Fraud
- Anti-Money Laundering
- Anti-Social Behaviour, Hate Crime & Domestic Abuse
- Attendance Management
- Capability
- NHF Code of Conduct
- Disciplinary
- Equality, Diversity & Inclusion
- Financial Regulations & Scheme of Delegation
- Flexible Working
- Grievance
- Health & Safety
- Probationary
- Probity
- Procurement
- Property Investment
- Redeployment
- Recruitment & Selection
- Risk Management Strategy & Framework
- Safeguarding
- Secondment
- Special Leave
- Request for Study & Training
- Tenancy Fraud
- Treasury management
- Whistleblowing

Achievements 2022-23

Salix Homes undertook the following actions to combat modern slavery and human trafficking during 2022-23:

- Board members and all senior management took responsibility for implementing this statement and its objectives and provided adequate resources (e.g. training etc.) and investment to ensure that slavery and human trafficking was not taking place within the organisation and/or supply chains.
- All colleagues were able to access a copy of this Modern Slavery and Human Trafficking Statement, alongside a briefing note that provided 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 are reviewed as part of an annual schedule to ensure they continued to reflect our commitment to the Modern Slavery Act 2015.
- Tender documents and contract terms and conditions were reviewed to ensure they supported our zero-tolerance ethos.

- Salix Homes continued to raise awareness and understanding of the risk of modern slavery and human trafficking across the organisation.
- Introduced ongoing assessments with key suppliers to include what they are doing to reduce the risk of modern slavery in their supply chains.
- Completed audits of our high-risk areas such as:
 - Procurement
 - Employment
 - Service Delivery

Ongoing Commitment 2023/24

Salix Homes is committed to ensuring as far as possible that there is no modern slavery or human trafficking in any part of our business. Salix Homes are committed to:

- Continuing to raise awareness of modern slavery and human trafficking across our business areas, supply chains and local communities.
- Adding modern slavery to the schedule of colleague communications.
- Continuing to review the processes and procedures for the reporting of modern slavery concerns.

Declaration

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 2024. This statement will be reviewed and published annually.

Signed:



Chair
Salix Homes Ltd

Date: 26 September 2023