

MODERN SLAVERY STATEMENT 2023

The Modern Slavery Act 2015 (the Act) requires organisations supplying goods, services or works with a turnover of more than £36 million to prepare and publish an annual Modern Slavery Statement.

Our Commitment

Acis Group Limited ('AGL') is committed to preventing slavery and human trafficking in all its business activities and with supply chains. This Statement outlines the steps we have taken to ensure compliance with the Act and to minimise the risks of any association with practices which undermine the principles of safety and dignity for all our customers and at work, particularly for people from vulnerable groups. This statement covers our current position on modern slavery and activities undertaken during the financial year 2022/23.

AGL has a duty to comply with the Modern Slavery Act 2015 and a responsibility under section 52 of that Act to notify the Secretary of State of any suspected victims of slavery or human trafficking.

The Acis way

AGL believes that customers come first. We aim to deliver great service to all our customers, both internal and external, in line with our vision to "create opportunities for people to have better lives through the provision of better homes and better services". Our values, and our processes aim to prevent slavery and human trafficking within our business activities and external supply chain.

Our structure, business and supply chains

AGL is a company limited by guarantee, a registered charity and a registered provider of social and affordable housing. AGL is also the parent company in a group structure.

We are committed to responsibly managing our supply chain, treating our customers and suppliers fairly and with respect, and allying ethical procurement with value for money.

We will take steps to satisfy ourselves that our supply chains are satisfactory in terms of the requirements of the Act, as well as meeting any formal requirements we set out for our suppliers.

Responsibility for compliance with the Act rests at the highest level, with our Board and Executive Leadership Team. Responsibility for preparing the statement has been assigned to the Head of Legal and Governance, who is also our Company Secretary.

Our supply chain consists mainly of works and services rather than goods, with one of the highest risk areas being associated with our building and maintenance activities. We believe that our wider supply chain most likely stretches outside of the United Kingdom, although all of the suppliers that AGL has direct contract with are based in the United Kingdom.

We may come across slavery and/or human trafficking in connection with the vulnerable people that we support, in particular those from a minority or socially excluded group, who

may be subject to forced labour and/or domestic servitude, and potentially in connection with our workforce. Accommodation managed by AGL could also be a potential venue for modern slavery.

Our Slavery and Human Trafficking Policies, together with other relevant policies

The Act requires organisations to take steps to address modern slavery and human trafficking in their businesses and supply chains. As AGL has a turnover of over £36m, we are publishing this statement setting out what we have done to recognise and prevent potential incidences of modern slavery.

The most vulnerable groups in the UK include migrant workers, illegal migrants, asylum seekers and individuals, such as homeless people and people with learning difficulties. We are working on identifying how modern slavery and human trafficking may affect customers, our business and supply chains. This involves educating staff about the potential risks and capturing best practice in policies and procedures.

We are confident that our policies promote good behaviour among our people at work and within our supply chain. Our policies and procedures are kept under review to ensure that they reflect AGL's evolution and our regulatory and statutory obligations. AGL has a number of policies and procedures in place that contribute to ensuring modern slavery does not occur within our business or supply chain which include:

- Employee Code of Conduct;
- Dignity at Work Policy;
- Equality, Diversity & Inclusion Policy;
- Anti-Fraud & Bribery Policy;
- Health & Safety Policies
- Recruitment Policy;
- HR suite of policies;
- Whistleblowing Policy;
- Domestic Abuse and Safeguarding Policies;
- Financial Regulations/Standing Orders.

Also, AGL operates safer recruitment processes that require all potential new employees to be vetted prior to employment commencing; this allows AGL to confirm qualifications and eligibility to work in the UK.

Where there is a need to source agency staff AGL uses a managed service provider whereby the recruitment practices form part of the contractual arrangements and have been checked in advance of accepting employees. The managed service provider has undergone due diligence to ensure their practices comply with the legislation and decrease the risks to AGL.

In addition to this, AGL requires its suppliers to have policies, procedures and training in place to know how to raise and report incidents of suspected modern slavery and/or human trafficking. Where a relevant supplier does not have some or all of these documents then that supplier will be required to adopt AGL's approach.

Our Procurement

Our Procurement Strategy is designed to ensure we operate in a legal, ethical and inclusive manner whilst achieving best value for money. This includes enabling our procurement activity to generate social and environmental, as well as commercial, benefits.

As there is a greater potential risk of modern slavery and/or human trafficking within the construction part of AGL's supply chain we have looked at the two main consortia that AGL procures through. Both consortia have built in criteria that a contractor must satisfy in order to be considered for the frameworks.

In 2022/23 the main mitigation has been to move to a single "master contractor".

Compliance with the Act has been included within our procurement and contract management policies and procedures as the procurement and contract procedure has been amended to reflect the Act.

The procurement process documentation has been amended in order to incorporate specific due diligence e.g. selection questionnaire, standard documents, pre-procurement checks, and a risk register. Also the Procurement Strategy has a specific action in order to check that due diligence has been complied with via auditing procurements.

In our 2022 Modern Slavery Statement we stated that we would implement the following in 2022/23:

- Check that all new suppliers with a turnover greater than £36 million have an up to date Modern Slavery Policy and if a supplier provides works to AGL's only identified high risk category and has a turn over less than £36 million, to assess them.
- As deemed appropriate, AGL will monitor each year that the supplier has an up-to-date Modern Slavery Policy. Also if any of these suppliers provides works to AGL's only identified high risk category, then they shall attend every other year an induction/refresher training that will also cover Modern Slavery.

Our new financial system went live on 1 April 2022 and the workflow process for new suppliers was completed in October 2022. Whilst reviewing the implementation of the system it was noted that the process for new suppliers did not ask for the supplier's turnover and therefore no checking was carried out to establish if that supplier had an up to date modern slavery statement. That process has now been included into the system, with ongoing checking now in place for new suppliers, and is a work in progress checking high risk works suppliers have an up-to-date modern slavery policy, partly due to the expenditure being gathered retrospectively. For clarity, regarding this action, AGL will look at construction suppliers (which includes our sub-contractors i.e. our second tier supply chain) where AGL spends over £100K per annum.

Induction/refresher training for modern slavery (which shall be included as part of our H&S safeguarding training) is expected to commence in October 2023 for AGL's key suppliers.

Our due diligence processes in relation to slavery and human trafficking in our business and supply chains

We have taken time to understand the implications of the Act and to identify the areas within our business and supply chain where the greatest risks exist. These are:

- Procurement, and;
- Supporting vulnerable clients living within our homes.

We have undertaken risk assessments in respect of these key areas and put measures in place to mitigate them. These include:

- Undertaking a review of our policy framework and instigating amendments to support compliance;
- Screening our procurement documentation to ensure that adequate safeguards are in place at each stage in the process i.e. soft market testing, pre-qualification questionnaires and formal tender. Our documentation already reflects our commitment to being a responsible business by incorporating requirements on social value;
- Ensuring that both AGL and any preferred supplier employment agencies that AGL uses has the correct checks and balances within its recruitment systems, such as eligibility to work in the UK and Disclosure and Barring Service (DBS);
- Our approach to training has been assessed.

Our risk identification, assessment, management and/or mitigation

Whilst a wider range of performance indicators are being implemented, the main method of monitoring effectiveness within the supply chain is included in the pre-qualification criteria for suppliers, which includes a requirement to have measures in place to minimise the possibility of modern slavery in their business and supply chain.

AGL has established safeguarding (which includes Modern Slavery) policies and procedures with its partner agencies to safeguard the welfare of children and vulnerable adults and protect them from harm.

Our training

Currently we have a protecting vulnerable adults and children programme of training that employees must complete to enable them to know how to report incidents of abuse and neglect.

In addition to this we have provided an e-learning module which covers modern slavery and human trafficking to our people and make that learning mandatory training. All of our people are required to undergo the training on an annual basis to help them identify what human trafficking and slavery is, how to identify when this is happening and what to do.

DECLARATION

This statement has been approved by AGL's Joint Leadership Team and by the Board of Directors and is made pursuant to section 54(1) of the Modern Slavery Act 2015.



Kath Smart
Chair of Acis Group Limited
September 2023