



Modern Day Slavery Statement

1. Purpose

- 1.1. Falcon Housing Association CIC (FHA) are committed to acting ethically and with integrity in all business dealings and relationships and implementing and enforcing controls to ensure that modern day slavery and human trafficking is not taking place within FHA and its supply chain.

2. Policy Statement

- 2.1. This statement is made on behalf of Falcon Housing Association C.I.C (FHA).
- 2.2. FHA have a zero-tolerance approach to modern day slavery and human trafficking. We are committed to acting ethically and with integrity in all business dealing and relationships and implementing and enforcing controls to ensure that modern day slavery and human trafficking is not taking place within FHA.
- 2.3. Modern day slavery and human trafficking is a crime and a violation of human rights. It can take place in forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which deprives a person of their liberty by another with the aim to exploit them for commercial, financial and personal gain.
- 2.4. As a business, FHA are committed and dedicated to upholding the highest standards of probity, openness and transparency to protect our assets and reputation, safeguard public funds and provide our customer with the best service.
- 2.5. In compliance with the Modern Slavery Act 2015, FHA does not tolerate slavery, human trafficking, exploitation or corruption of any kind in the work we do, in the work our partners do and in our wider supply chain.
- 2.6. We expect those we work with to have the same attitude and approach and we would never knowingly seek to work with any organisation whose approach or practices were found to be incompatible with our own.
- 2.7. This Policy is reviewed annually and published on our website www.falconha.org

3. Reference

3.1. External

- Modern Day Slavery Act 2015

3.2. Internal

Our policies and procedures are committed to acting ethically, responsibly and with integrity at all times to ensure our business and relationships enforce the effective systems and measures to ensure slavery and human trafficking are not taking place in our supply chain.

Our policies and procedures are reviewed regularly and the below policies support FHA's commitment to ensure slavery and human trafficking does not occur within our company:

- Health and Well Being Policy
- Health & Safety Policy
- Equality and Diversity Policy
- Board Member and Recruitment Policy
- Code of Conduct Policy
- Probity Policy
- Procurement Policy
- Recruitment Procedure
- DBS Checking procedure

4.0. Areas of Risk

The key areas of risk identified are:

- Supply Chain
- In our specialist supported housing properties
- Recruitment activities

Our commitment to tackling modern day slavery and human trafficking are conducted through the following:

4.1. Supply Chain

All products and services are obtained adhering to our Procurement Policy and service level agreements are in place with operational contractors.

4.2. Specialist Supported Housing Properties

Through FHA's delivery of enhanced and intensive housing management. FHA officers are regularly in contact with tenants and schemes to ensure that there is regard for safeguarding and any concerns are raised promptly and through the correct authorities.

4.3. Recruitment Activities Pre-employment checks are completed through work permits, references and DBS checks where required and payment of the UK minimum wage.

5.0. Future Actions

5.1. During the financial year 2023-24 FHA intends to further expand the steps taken to combat modern day slavery and human trafficking:

- Review of the activities in the supply chain to identify modern day slavery and human trafficking through our supply chain
- Review of the Procurement Policy
- Enrolment of all staff in Modern Slavery training course and incorporation as part of new starter induction

6.0. Responsibility

6.1. The Chief Executive has overall responsibility in the approval of policy before publication.

6.2. Any employees who breach this policy will face disciplinary actions which could result in dismissal for mis-conduct or gross mis-conduct. FHA may terminate the relationship with any other individual and and/or organisation working on our behalf if they breach this



policy.

7.0. Monitoring

7.1. The monitoring of outcomes is essential for FHA to track the impact of our approach to Modern Day Slavery and the policy will consider:

- Updating of the Modern Day Slavery statement on FHA website annually
- Modern Day Slavery training for employees

Monitoring information will be reported to the Board of Management on a yearly basis.

8.0. Review

8.1. This statement will be reviewed annually.

Review Process			
Policy review frequency:		Responsible for review:	
This statement will be reviewed annually		This statement will be reviewed by: Chief Executive	
Version Control			
Version	Date approved	Next review date	Author / Title
V1	April 2022	April 2023	Sharon Bannister Scollen

Signed 

Name: Sharon Bannister Scollen, Chief Executive, FHA