

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 <u>www.falconha.org</u>

3. Reference

- 3.1. External
 - Modern Day Slavery Act 2015 (<u>Modern Slavery Act 2015 (legislation.gov.uk)</u>

3.2. Internal

Our policies and procedures are committed to acting ethically, responsibly and with integrity always 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, Safety and Wellbeing Policy
- Equality and Diversity Policy
- Board Member and Recruitment Policy
- Probity Policy
- Procurement Policy
- Recruitment Policy
- Disclosure Barring Service 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 is conducted through the following:

4.1. Supply Chain

All products and services are obtained adhering to out 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, ID, references and DBS checks where required and payment of the UK minimum wage.

5.0. Actions

- 5.1. FHA take regular steps to combat modern day slavery and human trafficking by:
 - Reviewing the activities in the supply chain to identify modern day slavery and human trafficking throughout our supply chain
 - Regularly reviewing the Procurement Policy
 - All staff completing the Modern Slavery eLearning course.



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 misconduct or gross misconduct. 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 FHA are committed to:
 - 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 Executive	be reviewed by: Chief
Version Control			
Version	Date approved	Next review date	Author / Title
VI	April 2022	April 2023	Sharon Bannister Scollen
V2	Feb 2024	Feb 2025	Sharon Bannister Scollen
V3	Feb 2025	Feb 2026	Sharon Bannister Scollen

Signed: Sharon Bannister Scollen

Name: Sharon Bannister Scollen, Chief Executive, FHA