

Modern Slavery & Human Trafficking Statement

The Modern Slavery Act 2015 consolidates various offences relating to human trafficking and slavery.

In broad terms:

- 'slavery' is where ownership is exercised over a person.
- 'servitude' involves coercion to oblige a person to provide services.
- 'forced or compulsory labour' is where a person works or provides services on a non-voluntary basis under the threat of penalty.
- 'human trafficking' involves arranging or facilitating the travel of a person with a view of exploiting them.

Section 54 of the Act imposes a legal obligation on large commercial organisations to report on transparency within supply chains and requires the publication of an annual slavery and human trafficking statement. This statement constitutes Melin Homes' Modern Slavery and Human Trafficking statement. Of Melin's wholly-owned subsidiaries, this statement covers the activities of Candleston Limited, which procure goods and services from and form part of Melin's supply chain.

Introduction

Melin first published its approach to Modern Slavery & Human Trafficking in 2016 and this statement has been revised each year to reflect the ongoing work that is being carried out in line with its commitment to preventing slavery and human trafficking amongst all business activities and within our supply chains. It demonstrates the measures that we are taking to ensure compliance with the Modern Slavery Act 2015 (MSA 2015) and to minimise the risks of any association with practices which undermine the principles of safety and dignity for our customers and at work particularly for people from vulnerable groups. It covers our current position on modern slavery and activities undertaken during the year.

Our work within the housing and care sectors means that we have a responsibility to take a robust approach to slavery and human trafficking.

We are totally committed to preventing slavery and human trafficking in our corporate activities and within our supply chains.

Organisation Structure and Supply Chains

Melin takes steps to combat slavery and human trafficking. We have a zero-tolerance approach to slavery and human trafficking and are committed to acting ethically and with integrity. We also take steps to ensure that all our activities and our supply chains operate both on a legal and ethical basis.

This statement covers the activities of Melin Homes as follows:

- Melin offers a broad range of products to meet the housing needs and aspirations of its customers based upon personal circumstances. This includes a wide range of housing solutions for those unable to access market priced housing;
- We work to make a positive difference to the lives of customers through strengthening communities, working in partnership with others to build capacity, create employment opportunities and promote independence;
- We operate an active asset management strategy that aims to maximise the effective use of capital and maintaining high accommodation standards;
- We operate an effective energy strategy that aims to increase community awareness of environmental and energy matters and reduce fuel poverty;
- We work to drive forward innovative service solutions that enhance customer experience and promote the efficient use of our services;
- We manage over 4,000 homes and deliver a range of services and projects to build better communities;
- We have established ourselves as a market leader in the provision of care and support to older and vulnerable people living within the community and is well placed to secure new delivery contracts across South Wales;
- We maintain existing properties across the areas in which we operate;
- We are a major developer of new homes across South East Wales.

Melin spends a significant amount of money on goods, works and services and we aim to maximise value and best practice through the procurement of these services. Our auditors audit our supply chain requirements.

Risk

Melin controls risk through its Audit & Assurance Committee and Risk Register. Its aim is to safeguard the assets of the company, ensure compliance with all statutory and regulatory requirements and maximise the

opportunities to achieve our corporate objectives.

High risk activities

Melin does not carry out activities that are considered to be at high risk of slavery or human trafficking.

Responsibility for Melin's anti-slavery and human trafficking initiatives is as follows:

- **Policies:** The Performance & Business Intelligence Manager is responsible for managing and leading the development of new and existing policies and procedures across Melin through Melin's Policy Gateway. All policies are subject to a sign-off process and include an Equality Impact Assessment. Modern Slavery impacts across a range of policies.
- **Risk Assessments:** We state within our risk register that we will comply with the Modern Slavery Act and procedures for monitoring modern slavery requirements are effective. Production of our Modern Slavery statement will also mitigate some of our previously recognised risks.
- **Investigations / Due Diligence:** TIAA, our Internal Auditors, will identify and examine any potential lack of probity. The work would be scoped and an appropriate fee charged if required.
- **Training:** Melin includes training on modern slavery and human trafficking within its corporate training plan and it forms part of the induction process for new staff.

Relevant policies

Melin operates the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking:

- Employee & Managers Codes of Conduct;
- Procurement Policy;
- Recruitment Policy;
- Whistleblowing Policy;
- Modern Slavery Toolkit.

In addition, Melin were the first organisation in Wales to sign up to the Welsh Government's Code of Ethical Employment in Supply Chains which sets out a framework around employment issues that includes Modern Slavery and Human Rights Abuses, Blacklisting, False Self Employment, Unfair Use of Umbrella Schemes, Zero Hours Contracts and Paying The Living Wage. Melin is constantly evolving our processes to ensure we

comply with the Code and continue to support our contractors to sign up to the code and operate within the same framework.

Due diligence

Melin undertakes due diligence when considering taking on new suppliers or where it works in partnership with other organisations. Our due diligence and reviews include:

- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers if needs be and requirement to implement action plans.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of our business relationship.

Monitoring Effectiveness

We have reviewed our performance measures in light of the Modern Slavery Act 2015 and as a result, have introduced and monitor the number of breaches of Modern Slavery Act, to ensure we achieve the target of Zero.

We will continue to require all staff to complete awareness training on modern slavery, both on an annual basis for current staff and as part of their induction for new staff.

In relation to new suppliers, for any tenders for contracts, compliance with the Modern Slavery Act has been included within the selection process, and any failure to meet this will lead to disqualification of the applicant. Standard clauses have been included within our contract terms and conditions seeking assurance from suppliers that they comply.

Training

Our online learning system, Learning Pool, has an eLearning module which covers modern slavery and human trafficking and is a mandatory requirement for all staff at Melin. We also make available to all staff, via the intranet, basic information on what staff need to do to flag up potential slavery or human trafficking issues and what external help is available (e.g. Modern Slavery Helpline).

More detailed modern slavery training is provided for staff involved in procurement and supply chains on an annual basis and we will continue to include our partners, suppliers and contractors on relevant training.

In addition, members of staff employed within the Sustainability Team with responsibility for procurement advice and support are undertaking Chartered Institute of Procurement & Supply (CIPS) professional qualifications and are receiving specialist training on ethical procurement. This specialist knowledge and skill will be fed into Melin practices.

Looking Ahead

Over the course of the next year, we will continue to enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers.

Board Approval

This statement has been approved by Melin Homes Board who will review and update it annually. This statement was last reviewed in November 2019.

Chair of the Board signature:

J. Thomas.....

Chair of the Board Name:

Julie Thomas.....

Date:

4/12/19

Chief Executive signature:

P. Kennedy.....

Chief Executive Name:

Paula Kennedy.....

Date:

4/12/19

