

## **Modern Slavery and Human Trafficking Statement 2019**

The Modern Slavery & Human Trafficking Act requires the publication of a statement setting out how we address potential slavery and human trafficking risks within our business and supply chain.

This statement sets out Metropolitan Thames Valley's position at 31 March 2019.

We are committed to preventing slavery and human trafficking in our operations, and we confirm that, to the best of our knowledge, there is no slavery or human trafficking within our business or supply chain.

### **Organisational structure and supply chains**

Thames Valley Housing Association is the parent company of the Group which includes Metropolitan Housing Trust Limited, Metropolitan Living Limited, EMPS Limited, Thames Valley Charitable Housing Association Limited, Opal Land LLP, Fizzy Services Management LLP and Evolution Woking. The Group operates within the social, affordable, private sale and market rent housing sectors and manages a range of care and support services where we support thousands of people to live independently across London, the Midlands and the East of England. Thames Valley Housing Association, Metropolitan Housing Trust and Thames Valley Charitable Housing Association are Community Benefit Societies and are Registered Providers of housing regulated by the Regulator of Social Housing. Metropolitan Thames Valley develops, owns and manages more than 57,000 homes across London, the South East, East Midlands and the East of England. It employs approximately 1,500 staff and for the year ended 31<sup>st</sup> March 2019 had a turnover of £411M.

The Group contracts out the development and construction of its properties, care & support, estate cleaning and gardening and maintenance services. The Group's supply chain includes contractors who carry out these services, professional advisors and corporate services providers. The Group's head office is located in Farringdon, London.

The Group operates solely within the UK and considers that its activities are low risk in terms of modern slavery or human trafficking.

### **Due Diligence**

Metropolitan Thames Valley meets or exceeds all statutory requirements relating to staff employment. It is committed to dignity at work and to the fair treatment of all staff. All employees are paid to recognise their roles and responsibilities at or in excess of the Living Wage. Metropolitan Thames Valley's recruitment and selection policy includes provisions addressing modern slavery and human trafficking.

The Group's tendering processes follow best practice. Large procurement exercises are carried out by specialist consultants. When seeking new contractors, bidders are required to provide details of their approach to addressing modern slavery and human trafficking.

As a Registered Social Landlord Metropolitan Thames Valley is a contracting authority and therefore subject to the Public Contract Regulations 2015. We are governed by directives to ensure that the principles of non-discrimination and transparency are upheld with the aim of fostering a common internal market. We are prohibited in relation to discrimination on the basis of nationality, grant freedom of establishment, and establish the freedom to provide services. In order to cultivate an internal market, all public procurement policies must comply with these principles. Metropolitan Thames Valley advertises its sourcing opportunities in the Official Journal of European Union (OJEU). We source our supplies, services and works from third party suppliers principally within Great Britain.

For the purposes of this statement we include evaluation criteria relating to the Modern Slavery and Human Trafficking Act within our procurement documents and robust clauses within all forms of contracts.

Metropolitan Thames Valley uses only specified, reputable employment agencies to source labour and always verifies the practices of new agencies before accepting workers from that agency.

Metropolitan Thames Valley's corporate policies are reviewed at least every 3 years and are approved by the Executive Team or the Board. The main corporate policies which incorporate the identification and approach to modern slavery and human trafficking are the Whistleblowing Policy, the Safeguarding Policy and the Code of Conduct, Purchasing Policy, Grievance Policy, Diversity Policies and Remuneration Policies.

### **Training and Awareness**

Metropolitan Thames Valley ensures that all employees understand the signs of modern slavery or human trafficking, and know what action they can take. A training course covering the understanding and identifying modern slavery and human trafficking has been introduced and is being completed by staff. All employees within the procurement department have undertaken Ethical Procurement and Supply training which incorporates modern slavery issues. The Act and our approach to reducing slavery and human trafficking is promoted through our intranet, in addition to employees being required to certify that they have read and understood core corporate policies, including this modern slavery and human trafficking statement.

This statement is made pursuant to S54 of the Modern Slavery Act 2015 and constitutes our Modern Slavery & Human Trafficking Statement for the year ended 31<sup>st</sup> March 2019 and has been approved by the Board, who will review and update the statement annually.

**Geeta Nanda, Chief Executive**  
**September 2019**