

Modern Slavery Act - Transparency Statement 2022

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 for financial year ending 2021/22 and sets out the steps that ARHAG has taken and continues to take to ensure that modern slavery or human trafficking does not occur within our business or supply chains.

Commercial organisations with a turnover of more than £36m are required by law to make this statement. As such ARHAG is not compelled to review its practices and make a public statement under law, however the culture that the Act and the required statement sets is ingrained in ARHAG's corporate plan. We feel it is only right that we set clearly set out our position.

About us

ARHAG was founded in 1979 as a campaign group to challenge the housing disadvantages experienced by African migrants and refugees. It developed as a housing association under the Housing Corporation's strategy for Black and Minority Ethnic (BME) Housing Associations. We registered with the Registrar of Friendly Societies in 1979 and with the Housing Corporation in 1988.

ARHAG is an organisation that cares about people who are destitute, disadvantaged and less able to fend for themselves. Migrants and refugees are particularly vulnerable in our society today and as such, ARHAG will endeavour to provide them with better housing solutions/options and support to settle successfully in London.

We believe that by making this voluntary statement we are directly supporting our vision, which is:

"to ensure every migrant and refugee in London has a good home, is empowered to safeguard their individual rights, have their voice heard and make a full contribution to their community"

What is modern slavery?

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. ARHAG has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain. We will not knowingly deal with any business involved in slavery or human trafficking.

How we address the problem

Potential risks are mitigated by our policies and procedures, controls built into our business operations and the knowledge, skills, and behaviours of our staff. The organisation's documents that are relevant to slavery and human trafficking are:

- Standing Orders and Arhag Rules
- Code of Conduct Policy
- Procurement Framework

- Recruitment and Selection process
- Safeguarding Reporting Procedure
- Whistleblowing Policy

ARHAG will continue to review and update relevant policies and procedures as part of our improvement programme, to enable effective and proportionate steps are taken to ensure there is no slavery and human trafficking in the business.

We have a robust internal audit plan in place, which is reviewed on an annual basis and provides assurance across necessary areas of our business. We will ensure the scope of the audits include controls against Modern Slavery.

In addition to the Internal Audit Plan there is a robust Management Assurance Framework which requires checks and balances to be completed across all operational areas, ensuring policy and procedural compliance.

We regularly review of our key strategies and are developing our approach to Equality, Diversity, and Inclusion.

New employees are required to produce original documentation of their right to work in the UK on commencement of employment.

We recognise GMB Trade Union and support their involvement in relation to employee rights.

We do not operate zero-hour contracts and comply with the National Living Wage requirements.

Our Supply Chain

ARHAG engage with a wide variety of organisations for a broad range of goods and services that are primarily corporate, construction and property related.

Some of our supplier's subcontract work or rely on recruitment agencies to supply permanent or temporary staff. Whilst we consider that the risk in our supply chains is low, we recognise that no supply chain can be considered entirely risk-free.

Our tendering process via framework procurement ensures we engage with reputable contractors and suppliers who adhere to all appropriate legislation, regulation, and practices.

No breaches of the Act during 2021/22 have been identified. However, we will continue to be vigilant and where a compliance breach is identified, we will act promptly, involve the appropriate lead agencies and feed back lessons learnt in order to minimise the risk of an incident occurring again.

Training and Awareness

We will improve awareness of modern slavery and human trafficking by publishing the statement on our website.

We recognise that we may also encounter slavery and human trafficking in connection with tenants and customers we support and that our homes could be used for modern slavery.

We have a safeguarding process in place, and we will review training delivery to raise awareness of what slavery and human trafficking might look like and to encourage key tenant and customer facing staff to report concerns.

We will continue to raise awareness and deliver training to new and existing staff on safeguarding.

A handwritten signature in black ink, appearing to read 'CHS' followed by a stylized flourish.

Chief Executive Officer / Company Secretary

Name: Chris Harris

Date: September 2022