

# **Modern Slavery Act 2015**

## **The Calico Group Annual Statement 2019/20**

Calico is a group of companies dedicated to making a positive difference to people's lives through provision of housing, care, support, training and life skills. We are committed to ensuring compliance with the Modern Slavery Act 2015 (MSA) through service delivery and throughout our supply chain.

As a provider of a diverse range of services we have a multi-disciplined supply chain to support our services including construction and maintenance, materials, medical supplies, consultancy etc.

This statement outlines the steps we have taken to comply with the requirements of the MSA 2015 and the steps we will take to play our part in eradicating modern day slavery and human trafficking.

Initiatives to identify and mitigate risks are:

- We have reviewed the organisations values and these are cascaded through to staff at all levels within the business.
- Where possible we build long standing relationships with local suppliers and make clear our commitment to support the eradication of slavery.
- We have a procurement strategy in place.
- We undertake checks at recruitment to confirm 'right to work' and checks with the Disclosure and Barring Service for the protection of vulnerable customers and clients.
- We undertake checks for property lettings to ensure rights of residency and periodic visits to engage with residents.
- We have a Safeguarding Policy and provide staff training on human trafficking and safeguarding.
- We encourage staff entering properties for repairs purposes to be aware of potential vulnerability and safeguarding issues and to raise concerns with Neighbourhood Officers.
- We have in place an Equality, Diversity and Inclusion (EDI) strategy that aims to achieve fairness in society through its broad objectives: Culture and Governance; Understanding our Customers; Shaping Services and Action through Procurement and Partnerships.
- Where we operate in Uganda and Ghana this is as part of an international partnership with Liverpool Hope University, Sanctuary Housing (formerly CDHT), VMM and Mountains of the Moon University in Fort Portal who have policies in place to ensure the protection of vulnerable people.
- We have policies in place to encourage and support whistle blowing.
- The company will not knowingly support or deal with any business involved in slavery or human trafficking.
- Training about slavery and human trafficking is available to staff.

We have zero tolerance to slavery and human trafficking. We expect all staff and those in our supply chain and contractors support this statement and comply with our values. During 2018-19 we intend to continue to implement the following actions to further strengthen our approach to supporting the eradication of modern day slavery:

- We will review our Procurement Strategy to check for compliance with the Modern Slavery Act and promote our commitment to eradicating modern day slavery throughout our supply chain (contractors, sub-contractors, policies, contracts etc.).
- We will undertake data analysis for the areas of operation to identify higher risk areas.
- We will review our EDI objectives to ensure inclusion of appropriate actions to support our approach in acting as a role model for the eradication of modern day slavery.
- We will regularly audit and review our practices for checking all employees are paid at least the minimum wage and have the right to work.
- We will provide awareness training to staff and contractors on our duties to identify and raise concerns.
- We will undertake investigations to ensure the partnership which includes a contract for services in India is aligned to our statement and values.
- Relevant policy reviews will include a demonstration of our commitment to eradicate modern day slavery and how this links with the policy.
- We will use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:
  - Completion of Audits on key risk areas: Procurement, Recruitment.
  - Use of labour monitoring and payroll systems.
  - Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.
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This statement is approved by the Calico Group Board of Directors who has overall responsibility to ensure we comply with the MSA.

The Governance Team has responsibility for the implementation of this statement.

Managers at all levels have responsibility to ensure that those reporting to them understand and comply with this statement and are given adequate training on the issues of modern day slavery.

**This statement is made under section 54(1) of the Modern Slavery Act 2015. It constitutes our Group's slavery and human trafficking statement for the financial year ending 31<sup>st</sup> March 2020.**

**SIGNED:** *Anthony Duerden*

**Group Chief Executive**

**DATE: March 2019**