

# Modern Slavery and Human Trafficking Statement – January 2019

## Introduction

Unfortunately Modern Slavery and Human Trafficking remains a hidden blight on our global society. The UK is in no way excluded from this. Everyone has a responsibility to be alert to the risks, however small some maybe in our business itself and in the wider supply chain with whom we work with.

Connexus very clearly recognises its obligations to recognise and combat this ongoing risk and potential problem. Together with our partners, we have taken appropriate steps in order to identify, target and prevent modern slavery human trafficking from occurring. At Connexus we are always keen to examine how we approach Modern Slavery and Human Trafficking so that we can continue our good practice and review our good practice over the course of the year. This statement outlines the steps we have taken in order to achieve this objective.

## Our structure

Connexus is a not-for-profit housing association based in Shropshire and Herefordshire. We provide over 10,000 homes primarily across Herefordshire and Shropshire and wellbeing services in Worcestershire and Gloucestershire, along with national Careline services. With a turnover of over £50 million a year, we are one of the largest housing providers in Shropshire/Herefordshire.

Supported by our vision, we adhere to ethical business practices and partnerships. These are aligned to our strong social purpose. Our teams across all of the counties in which we work closely with our customers, partners, community and stakeholders to understand local communities and their current and future needs. Not only providing a social housing provision we also have a strong development pipeline and build a range of tenures from affordable rent to market sale across our counties.

For more information about who we are, our vision and values as well as our Board and Executive Management Team can be found at [connexus-group.co.uk](http://connexus-group.co.uk).

### Say hello

> Registered Office: Connexus Housing Ltd, The Gateway, The Auction Yard, Craven Arms, SY7 9BW  
> 0333 231 3233 > [connexus-group.co.uk](http://connexus-group.co.uk) > [hello@connexus-group.co.uk](mailto:hello@connexus-group.co.uk) > [@weareconnexus](https://www.instagram.com/weareconnexus)



## Our business

Connexus includes: Herefordshire Housing Ltd, South Shropshire Housing Association, Meres and Mosses Housing Association, Total Response Ltd, Independence Trust, Floreat Living Ltd, Floreat Development Ltd, Enterprise 4, Rise Partnership Development Ltd, Shropshire Housing Treasury Ltd, Herefordshire Capital Ltd.

## Our supply chains

As a large business based solely in the UK, we manage projects and procurements where services and products are sourced from a wide range of national suppliers. As a UK based business, we have concluded that our exposure to the risk of Modern Slavery and Human Trafficking is relatively low. However, that does not mean that we are complacent in any way and as a part of our ongoing process to identify and monitor risks we have identified that one of our key areas of risk lies in our relationships with supply chains and contractors. To manage this risk, we require third parties to acknowledge our commitment to combat slavery and human trafficking by inserting to the relevant clauses into our agreements.

## Our policies

We recognise that Modern Slavery and Human Trafficking can occur in the context of housing and therefore alerting all our colleagues to that risk is crucial to our approach. In addition to having relevant recruitment, L&D, safeguarding policies and procedures guiding our front line colleagues, we are also committed to ensuring that there is no Modern Slavery and Human Trafficking in our supply chains or in any other part of our business. Our Financial and Procurement Regulations reflect this commitment very clearly by prescribing effective systems and controls that eliminate conditions where Modern Slavery and Human Trafficking can occur. We are always keen to review those procedures in order to make them robust and suitable to current circumstances.

## Due diligence processes for slavery and human trafficking

We have taken the following steps:

- We require all new suppliers to declare that they are not involved in modern slavery and human trafficking. That they have not been subject to any investigation in connection with any offence involving slavery or human trafficking
- Provisions in our template contract documentation requiring our suppliers to take appropriate steps to ensure that there is no slavery or human trafficking in their supply chains and that they appreciate and mitigate risks appropriately.
- Ensuring that they provide training opportunities and awareness raising in that area to their colleagues.
- Where possible we build long standing relationships with local suppliers and business partners

highlighting our expectations or ethical business behaviour.

- We have in place systems for the reporting of concerns and the protection of whistle blowers.

## **Supplier adherence to our values**

Connexus has a zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values. All our Directors are responsible for compliance in their respective departments and for their supplier relationships across Connexus.

## **Training**

To ensure a high level of understanding of the risks of Modern Slavery and Human Trafficking in our supply chains and our business, we provide training to relevant to colleagues. We expect members of our supply chain to do the same.

## **Our effectiveness in combating slavery and human trafficking**

We use the following performance indications (KPIs) to measure how effective we have been to ensure that Modern Slavery and Human Trafficking is not taking place in any part of our business or supply chains:

- Completion of regular internal and external audits
- Use labour monitoring and payroll systems
- High levels of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.