



Modern Slavery Act (2015) Policy

Name	Reason for change	Date
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Approval process for current version

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Contents

1. Introduction	1
2. Requirements under the Act.....	2
3. Requirements for Poplar HARCA suppliers.....	2
4. Risk assessment and mitigation	2
5. Management responsibility.....	3
6. Policy review	3
7. Appendix 1: Impact assessment	3

1. Introduction

- 1.1. Poplar HARCA has a responsibility to ensure that its business practices and procurement methods are ethical.
- 1.2. Poplar HARCA supports international efforts to eradicate modern slavery and human trafficking. We expect the same commitment from all organisations we do business with and will not knowingly support any business involved in slavery or human trafficking.
- 1.3. Purchasing decisions must comply with the Modern Slavery Act (2015) and, under the *Transparency in the Supply Chain Provision*, Poplar HARCA must monitor and report compliance with the Act.

2. Requirements under the Act

2.1. Poplar HARCA must:

- ensure that its supply chains are free from domestic servitude, forced or compulsory labour and human trafficking
- demonstrate a proactive approach to assessing, mitigating and managing the risk of slavery in supply chains
- publish an annual statement setting out the steps taken to ensure that slavery and human trafficking is not taking place within its supply chains.

The statement summarizes measures taken during the previous reporting period and is published within six months of the end of the financial year. It is approved by the Board, signed by a director and must be prominently displayed on the website.

3. Requirements for Poplar HARCA suppliers

3.1. All Poplar HARCA suppliers must ensure that their own employees and those of their suppliers:

- are legally able to work
- have freely chosen employment (no forced or bonded labour)
- have a written contract
- have not had to pay fees or lodge documents to obtain work
- understand their statutory rights (i.e. sick pay and holiday pay)
- are paid in accordance with national law
- are working in a safe and hygienic environment
- are not expected to work excessively long hours and that working hours comply with national laws and guidelines

3.2. All Poplar HARCA suppliers should assess quotations and fees from any agency or supplier providing unusually low rates when compared with industry standards.

4. Risk assessment and mitigation

4.1. The requirement for compliance with the Modern Slavery Act (2015) has been added to Poplar HARCA's risk register.

4.2. Identified risks are reported to the Audit & Risk Committee.

4.3. All new contracts include a clause requiring compliance with the Modern Slavery Act (2015).

4.4. Poplar HARCA will act promptly when a compliance breach is identified and will report incidences of non-compliance to the Audit & Risk Committee, the Board and, if required, to the relevant authorities.

- 4.5. Emerging case law and best practice should be reviewed regularly.
- 4.6. Poplar HARCA will benchmark its activities against statements and action plans implemented by similar organisations

5. Management responsibility

- 5.1. The Director of Technical Resources is responsible for drafting the annual statement.
- 5.2. The annual statement will be presented to the Audit & Risk Committee and the Board for approval.
- 5.3. The contract manager/ procuring officer and their line management is responsible for ensuring that new contracts are compliant with this policy.
- 5.4. Contract managers/ procuring officers and their line management are responsible for ensuring that suppliers under existing contracts (those awarded before the introduction of this policy) and suppliers who are not under contract comply with this policy.

6. Policy review

- 6.1. Policies are reviewed every 5 years or sooner if they no longer reflect best practice.

7. Appendix 1: Impact assessment

How does the policy/procedure/strategy contribute to Poplar HARCA's aims?	The policy is a statement of our intention to meet all statutory obligations associated with the Modern Slavery Act.
Which group(s) of people benefit from the policy/procedure/strategy? If any group could be disadvantaged, what is the mitigation or justification?	No group has been identified as being potentially disadvantaged by this policy.
How have residents been involved in developing the policy/procedure/strategy? If they have not been involved, why not?	The policy is a statement of our intention to meet all statutory obligations associated with the Modern Slavery Act. There is no scope for resident involvement other than Board approval.
How will the policy/procedure/strategy be monitored and measured? (e.g. performance indicators?)	A requirement to monitor has been included in this policy document. Means of monitoring have been built into the Association's procedures.
If any, what are the Value for Money implications?	The policy is a statement of our intention to meet all statutory obligations. Value for Money is not a consideration for this policy.
Will personal data be collected, stored, used or shared?	No data protection issues have been identified.

If yes, a privacy impact assessment must be carried out.	
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