

Policy	Modern Day Slavery Statement
IG Pol 26	IG Pol 52
Approved by	Inclusion Board of Management
Date Approved	March 2021 for financial year 19-20
Lead officer/post	Business Director
Business area:	Business

1.0 Policy Statement

- 1.1 This statement is made for and on behalf of Inclusion Group (Inclusion) and its subsidiaries. The annual statement is published in line with consolidated group turnover being above the £36million the threshold.
- 1.2 Inclusion Group and subsidiaries have a zero-tolerance approach to modern day slavery and human trafficking. We are committed to acting ethically and with integrity in all business dealing and relationships and implementing and enforcing controls to ensure that modern day slavery and human trafficking is not taking place within Inclusion Group and its supply chain.
- 1.3 Modern day slavery and human trafficking is a crime and a violation of human rights. It can take place in forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which deprives a person of their liberty by another with the aim to exploit them for commercial, financial and personal gain.
- 1.4 As a business, Inclusion Group are committed and dedicated to upholding the highest standards of probity, openness and transparency to protect our assets and reputation, safeguard public funds and provide our customer with the best service.
- 1.5 In compliance with the Modern Slavery Act 2015, Inclusion Group does not tolerate slavery, human trafficking, exploitation or corruption of any kind in the work we do, in the work our partners do and in our wider supply chain.
- 1.6 We expect those we work with to have the same attitude and approach and we would never knowingly seek to work with any organisation whose approach or practices were found to be incompatible with our own.
- 1.7 This Policy is reviewed annually with 6 months of the financial year end and published on our website and internal intranet.

2.0 Reference

- 2.1 External
- Modern Day Slavery Act 2015
- 2.2 Internal

Our policies and procedures are committed to acting ethically, responsibly and with integrity at all times to ensure our business and relationships enforce the effective systems and measures to ensure slavery and human trafficking are not taking place in our supply chain.

Our policies and procedures are reviewed regularly and the below policies support Inclusion Group's commitment to ensure slavery and human trafficking does not occur within our company:

- Health and Well Being Policy
- Health & Safety Policy
- Equality and Diversity Policy
- Vulnerable People Policy
- Board Member and Recruitment Policy
- Code of Conduct Policy
- Probity Policy (incorporating Whistleblowing)
- Procurement Policy
- Recruitment Procedure
- Vulnerable Persons Procedure
- DBS Checking procedure
- Scheme Visit procedure

3.0 Areas of Risk

The key areas of risk identified are:

- Supply Chain
- In our residential schemes
- Recruitment activities

Our commitment to tackling modern day slavery and human trafficking are conducted through the following:

3.1 Supply Chain

All products and services are obtained adhering to our Procurement Policy and service level agreements are in place with operational contractors.

3.2 Residential Schemes

Through Inclusion's delivery of intensive housing management Inclusion officers are regularly in contact with tenants and schemes to ensure that there is regard for safeguarding and any concerns are raised promptly and through the correct authorities.

3.3 Recruitment Activities

Pre-employment checks are completed through work permits, references and DBS checks where required and payment of the UK minimum wage.

4.0 Future Actions

4.1 During the financial year 2021–22, Inclusion Group intends to further expand the steps taken to combat modern day slavery and human trafficking:

- Review of the activities in the supply chain to identify modern day slavery and human trafficking through our supply chain.
- Review of the Procurement Policy
- Enrolment of all staff in Modern Slavery training course and incorporation as part of new starter induction

5.0 Monitoring & Review

5.1 Monitoring

The monitoring of outcomes is essential for Inclusion Group to track the impact of our approach to Modern Day Slavery and the policy will consider:

- Updating of the Modern Day Slavery statement on the company website(s) annually.
- Modern Day Slavery training for employees.

Monitoring information will be reported to the Board of Management on a yearly basis.

5.2 Review

Overall monitoring and review of the policy will be undertaken in consultation with the Board of management.

This policy will be reviewed every year and published on the website(s) within 6 months of the financial year end.

6.0 Responsibility

- 6.1 The Board have overall responsibility in the approval of policy before publication.
- 6.2 Specific responsibilities for the managing Procurement, Vulnerable Customer and Peoples services have been delegated to the Executive team (Chief Executive Officer, Business Director, Finance Director, Property Director and Operations Director)
- 6.3 Any employees who breach this policy will face disciplinary actions which could result in dismal for mis-conduct or gross mis-conduct . Inclusion Group may terminate the relationship with any other individual and and/or organisation working on our behalf if they breach this policy.

Declaration

This policy statement has been approved by the Inclusion Group Board and will be reviewed, updated and published annually.

Signed

Name **Pete Ottowell, Inclusion Group Chair**