

## **Hexagon Housing Association Statement on Modern Slavery 2019**

### **Introduction to Hexagon HA**

Hexagon Housing Association is a charitable housing association registered as a Co-operative and Community Benefits Society with the Financial Conduct Authority and is a registered provider of social housing with the Regulator for Social Housing. Hexagon has one subsidiary company, namely Horniman Housing Association. Horniman is a non-charitable housing association also registered with the Regulator for Social Housing. Horniman Housing Association currently develops housing for outright sale and owns a small volume of shared ownership housing developed in the past.

Hexagon owns and manages approximately 4,300 homes in South East London and as part of our commitment to wider social responsibility we are committed to ensuring that we comply with all of our legal and regulatory responsibilities, including the Modern Slavery Act 2015. We take seriously our directive to ensure that slavery and human trafficking does not exist, not just within Hexagon, but within the business or supply chain that we contract with.

### **Our customers**

A small number of our customers receive a care and support service directly from Hexagon in two homes specialising in mental health. In addition, we house approximately 350 residents who may be vulnerable or at risk and are therefore provided with support services through third party suppliers who contract with the relevant local authorities.

### **Our people**

Hexagon carries out safeguarding training including the safeguarding of vulnerable residents. We are currently undertaking a review to ensure that this training explicitly covers the specifics around Modern Slavery. This is aimed at building awareness and understanding so that staff can identify potential risk factors and at risk groups including possible signs of exploitation so that we can respond appropriately. Where we engage with volunteers, we will also seek to ensure they are also properly supported and protected from exploitation.

As an employer, we are committed to paying all our directly employed staff at least the London Living Wage and our recruitment processes are designed to ensure that all new employees have the right to work in the UK.

We sometimes use employment agencies, particularly in the area of the direct provision of care and support so we are taking action to ensure that all agencies have confirmed their compliance with the Act and have sent us a copy of their compliance statement if their turnover meets the minimum threshold. Where they do not meet the minimum threshold, we will ensure that we obtain their confirmation that they are committed to mitigating any associated risks.

## Procurement/suppliers

Hexagon manages projects and procures services from many suppliers. We do not source either our new build programme nor our repairs and maintenance service (including major repairs) directly but rather via contracted suppliers.

Having said that, Hexagon does not wish to work with any business that is knowingly involved in slavery or human trafficking and therefore we are currently taking the following steps to ensure any risks are minimised.

- Any new suppliers contracting with Hexagon will be required to declare that they are not involved in slavery or human trafficking and have not been subject to any investigation in connection with any relevant offence.
- We will incorporate provisions in our standard contracts which will require our suppliers to take appropriate steps to ensure that there is no slavery or human trafficking in their supply chains.
- Where we are developing new tender documentation, we will notify all suppliers that we expect them to comply with the Modern Slavery Act as a contract condition. This will be reflected in all new contracts.

## Taking Action

Where we do encounter any evidence of non-compliance we will take appropriate remedial action and our intention is to only work with organisations who comply with the Statement and our contract requirements as well as those who are taking genuine steps towards compliance.

Hexagon also has in place a whistleblowing policy for all staff and they are encouraged to report any concerns that they have. This includes any evidence of non-compliance with the Act, or concerns about our supply chains or any issues relating to the Association's residents. We will be reviewing our Whistleblowing Policy during the year to ensure that it remains fit for purpose in respect of the Modern Slavery Act.

## Context and review

This statement is made under Section 54 (one of the Modern Slavery Acts 2015). It constitutes Hexagon's Slavery and Human Trafficking Statement for the year ending 31<sup>st</sup> March 2019. The turnover of the Hexagon Group exceeds £36m for that period.

We will annually review and update this Statement and ensure it is approved by Hexagon's Board.