Modern Slavery Policy

Policy Information

Item	Detail
Policy Title	Modern Slavery Policy
Policy Owner	Head of Strategic Procurement
Approval Body	Board, with oversight and assurance reporting through the Audit and Risk Committee
Review Frequency	Every 3 years, or sooner if required due to legislative, regulatory, organisational or operational changes / findings.
Next Review Date	November 2029
Applies To	All PCH Group employees, Board members, agency workers, apprentices, consultants, contractors, suppliers, subsidiary companies, partners and other persons acting on behalf of PCH. The Policy also sets out PCH's approach to identifying and responding to modern slavery concerns affecting residents, customers and communities.

1. Purpose

Plymouth Community Homes (PCH) is committed to conducting its business ethically and with integrity. We have a zero-tolerance approach to modern slavery, human trafficking, forced labour and exploitation.

PCH recognises modern slavery as a serious abuse of human rights. We are committed to respecting and protecting the rights, dignity, safety and wellbeing of people who may be affected by exploitation through our operations, services, homes, communities and supply chains.

This Policy sets out PCH's commitment to preventing modern slavery within:

- Our own operations;
- Our workforce;
- Our homes and communities;
- Our commercial premises; and
- Our supply chains.

The Policy supports compliance with the Modern Slavery Act 2015 and should be read alongside PCH's annual Slavery and Human Trafficking Statement and other related policies.

2. Scope

This Policy applies to:

- All employees;
- Board members;
- Agency workers;
- Apprentices;
- Consultants;
- Contractors;
- Suppliers;

- Subsidiary companies;
- Anyone acting on behalf of PCH.

All individuals within scope must comply with this Policy. Suppliers, contractors and partners must comply with relevant contractual requirements and are expected to support its principles.

Residents and customers are not required to comply with this Policy by virtue of their tenancy or receipt of services from PCH. However, the Policy establishes PCH's approach to preventing, identifying, reporting and responding to modern slavery and exploitation affecting residents, customers and members of the wider community encountered through the delivery of PCH's services. Residents and customers will be encouraged to report concerns through PCH's accessible customer, safeguarding and reporting channels.

3. Equality, Diversity and Inclusion

Plymouth Community Homes is committed to promoting equality, diversity and inclusion and ensuring that no individual or group is treated less favourably because of a protected characteristic, vulnerability or personal circumstance.

In implementing this Policy, PCH will have due regard to the Equality Act 2010 and will ensure that its services, processes and decisions are fair, accessible and inclusive.

An Equality Impact Assessment has been completed to identify and mitigate any potential adverse or disproportionate impacts arising from this Policy.

4. Modern Slavery Risk Management

PCH will identify, assess, manage and monitor modern slavery risks across its workforce, operations, homes and communities, commercial premises and supply chains. Modern slavery risks will be considered through PCH's established risk management, safeguarding, procurement, contract management, employment and governance arrangements.

Relevant services will apply proportionate controls based on the nature and level of identified risk. Material or recurring risks, control weaknesses and significant incidents will be escalated through PCH's governance and risk-management arrangements, with agreed actions monitored to completion.

The cross-functional Modern Slavery Policy and Assurance Group will support the periodic review of modern slavery risks and controls and provide assurance through the reporting arrangements set out in section 14 of this Policy.

5. Policy Statement

PCH will:

- Act in accordance with the Modern Slavery Act 2015 and support the protection of human rights, dignity, safety and wellbeing of people affected by modern slavery and exploitation.
- Take reasonable and proportionate steps to prevent modern slavery in our business and supply chains.
- Promote awareness of modern slavery and human trafficking.
- Encourage the reporting of concerns without fear of retaliation.
- Investigate concerns appropriately and act where required.
- Work with partner agencies where exploitation is identified or suspected.
- Continually improve our approach through regular review, monitoring and cross-functional governance involving Procurement, People & Culture, Safeguarding and Housing Services.

5.1 Partnership Working

PCH recognises that modern slavery is a complex issue requiring a coordinated multi-agency response. We will work collaboratively with local authorities, law enforcement agencies, safeguarding partners, charities, housing providers and other relevant organisations to help identify, prevent and respond to modern slavery and human trafficking.

Where appropriate, PCH will have regard to recognised local and national guidance, including Plymouth City Council's Tackling Modern Slavery and Human Trafficking Toolkit, to support awareness, identification of exploitation indicators and appropriate safeguarding responses.
Relevant teams will share intelligence and learning through appropriate cross-functional governance arrangements to support a coordinated approach to modern slavery risks.

6. What is Modern Slavery?

Modern slavery is an umbrella term covering serious forms of exploitation including:

- Criminal exploitation;
- Debt bondage;
- Forced or compulsory labour;
- Human trafficking;
- Labour exploitation;
- Slavery;
- Servitude.

Modern slavery can affect adults and children and may occur within legitimate businesses, supply chains, communities and private homes.

7. Responsibilities

Board

The Board is responsible for:

- Approving the annual Slavery and Human Trafficking Statement.
- Providing oversight of modern slavery risks.
- Ensuring appropriate governance arrangements are in place.

Executive Leadership Team (ELT)

ELT is responsible for:

- Promoting compliance with this Policy.
- Ensuring adequate resources and controls are implemented.
- Reviewing significant modern slavery risks and incidents.

Executive, Senior and Wider Leadership Teams (ELT, SLT and WLT)

All members of ELT, SLT and WLT are responsible for:

- Promoting awareness within their teams.
- Escalating concerns promptly.
- Supporting employees who may identify potential cases of exploitation.

Employees

All employees must:

- Remain vigilant to signs of modern slavery.
- Complete any required training.
- Report concerns promptly through appropriate channels.
- Comply with this Policy and related procedures.

Functional Responsibilities

The following allocation supports cross-functional ownership of the controls described in this Policy:

Function	Responsibility
Strategic Procurement	Coordinate the Policy and annual Statement; lead supply-chain risk assessments, procurement and contractual controls; support proportionate supplier

	assurance; and advise contract managers on modern slavery requirements within contract and supplier management activity.
People & Culture	Maintain recruitment, right-to-work, payroll and direct agency-worker controls; support induction, workforce training and workforce-risk information. Support publication, awareness and the delivery or recording of agreed training.
Thriving Neighbourhoods (Housing Services)	Identify, report and escalate indicators of suspected modern slavery, exploitation or trafficking identified through tenancy management, neighbourhood activity, resident engagement and community-based services.
Safeguarding	Advise on and coordinate safeguarding responses, referrals and support where exploitation is suspected.
Homes and Safety, Assets and Commercial	Oversee relevant contractors and commercial occupier controls and escalate concerns arising from premises, works or service delivery.
Governance and Risk	Support the identification, reporting, monitoring and escalation of modern slavery risks through PCH's risk-management framework and governance arrangements.

A cross-functional Modern Slavery Policy and Assurance Group, involving at least Strategic Procurement, People & Culture, Safeguarding, Thriving Neighbourhoods, Commercial Properties and Governance/Risk, will review effectiveness at least annually and report material issues, risk and agreed actions through PCH's agreed governance arrangements.

Suppliers and Contractors

Suppliers and contractors must:

- Operate ethical employment practices.
- Take reasonable steps to prevent modern slavery within their own supply chains.
- Cooperate with requests for information or assurance from PCH.
- Comply with all applicable modern slavery legislation and with PCH's relevant contractual and Supply Chain Code of Conduct requirements.
- Where suppliers or contractors engage agency or temporary labour, they must undertake appropriate assurance that labour providers operate legally and ethically and comply with applicable modern slavery, employment and right-to-work requirements. Evidence must be provided to PCH upon reasonable request.

8. Workforce Protection

PCH is committed to fair employment practices and will:

- Conduct appropriate recruitment checks including verifying an individual's identity and right to work before employment commences.
- Ensure employees are paid directly and through appropriate payroll arrangements.
- Monitor for indicators of potential exploitation.
- Operate a confidential whistleblowing process.
- Pay directly employed colleagues at least the Real Living Wage.
- Regularly review employment practices and procedures.
- Where PCH directly engages agency workers, seek proportionate assurance that labour providers operate legally and ethically and comply with applicable modern slavery, employment and right-to-work requirements.

9. Residents, Communities and Safeguarding

PCH recognises that social landlords may encounter indicators of exploitation through tenancy management and community engagement.

PCH will take reasonable and proportionate steps to identify, safeguard and support residents and members of our communities who may be vulnerable to, experiencing, or recovering from exploitation. Our response will be person-centred, sensitive to individual circumstances and coordinated with appropriate safeguarding and specialist agencies.

To reduce risks PCH will:

- Maintain robust tenancy verification and onboarding processes.
- Train staff to recognise safeguarding concerns and indicators of exploitation.
- Consider the individual's safety, communication, accessibility, wellbeing and support needs when responding to suspected exploitation.
- Monitor signs of potential tenancy misuse, unlawful subletting and exploitation.
- Investigate concerns in accordance with safeguarding and tenancy procedures.
- Refer concerns to relevant statutory agencies where appropriate.
- Work collaboratively with local authorities, police and safeguarding partners.
- Utilise relevant safeguarding guidance and local partnership resources, including the Plymouth City Council Modern Slavery Toolkit, to support the identification and reporting of modern slavery concerns.

10. Commercial Premises

PCH recognises that some business sectors may present increased modern slavery risks.
We will:

- Undertake proportionate checks on prospective commercial tenants.
- Remain alert to indicators of exploitation.
- Ensure relevant staff understand how to report concerns.
- Work with enforcement agencies where necessary.

11. Procurement and Supply Chain Management

PCH expects suppliers to operate ethically and responsibly.
Our approach includes:

- Requiring suppliers to comply with applicable modern slavery legislation.
- Requiring adherence to the PCH Supply Chain Code of Conduct.
- Including modern slavery provisions within procurement documentation and contracts.
- Applying proportionate, risk-based due diligence to suppliers and contracts, including consideration of sector, labour model, subcontracting arrangements, geography, contract value, service criticality and any known indicators of modern slavery risk.
- Monitoring suppliers where higher risks are identified.
- Taking appropriate action where concerns arise.

Where serious breaches are identified, PCH may terminate contractual arrangements where legally permissible. The action taken will be proportionate to the seriousness of the concern, the supplier's response, the safety and interests of affected workers, and PCH's legal and contractual rights.

12. Reporting Concerns

Anyone working for or with PCH must report concerns about potential modern slavery as soon as possible.
Concerns may be raised through:

- Line managers;
- Senior managers;
- Heads of Service or Directors;
- Safeguarding Policy and processes;
- Procurement Team;
- People & Culture;

- Whistleblowing Policy and process.

Anyone working for or with PCH who identifies or suspects modern slavery, human trafficking or exploitation must report the concern **promptly to the Police** via 999 (if an immediate risk of harm or a crime is in progress) otherwise using 101. Additionally, once the police report is complete, please notify the Procurement Team at procurement@pch.co.uk of the incident for recording purposes.

PCH will treat concerns seriously and investigate them appropriately.

Individuals raising genuine concerns in good faith will not suffer detriment or retaliation.

Appropriate well-being support will be available to colleagues who raise concerns or who may be affected by what they have seen or disclosed.

PCH will take a victim-centred and safeguarding-led approach when responding to suspected exploitation. Actions will be considered carefully to avoid increasing risk to an actual or potential victim.

Reported concerns will be recorded, triaged, escalated and monitored in accordance with PCH's approved safeguarding, whistleblowing, employment or supplier-management procedures, depending on the nature of the concern. The responsible lead service will maintain an appropriate record and ensure that significant concerns, actions, outcomes and organisational learning are reported through the relevant governance arrangements.

Where there is an immediate risk of harm, criminal activity or suspected exploitation, concerns must be escalated without delay through appropriate safeguarding procedures and, where necessary, referred to the Police, Local Authority or other statutory agencies. PCH will work with partner organisations to ensure concerns are managed appropriately and victims are safeguarded.

13. Training, Awareness and Wellbeing

PCH will communicate this Policy to colleagues following approval and will provide proportionate awareness training through induction, onboarding and periodic organisational awareness activity. Training and communication will explain individual responsibilities, relevant indicators of exploitation, internal reporting routes and the support available when a concern is raised.

Training may include:
- Understanding modern slavery;
- Recognising warning signs;
- Reporting procedures;
- Recognised local guidance, including Plymouth City Council's Modern Slavery Toolkit, to help staff understand indicators of modern slavery, local reporting arrangements and safeguarding responsibilities.

Enhanced training may be provided for teams working in higher-risk areas such as procurement, housing services, safeguarding, repairs and maintenance, and commercial property management. Appropriate well-being support will be available to colleagues involved in reporting or responding to modern slavery concerns.

Enhanced or role-specific learning will be prioritised for colleagues whose responsibilities or activities may bring them into contact with higher-risk workforces, suppliers, residents, tenancies, premises or services. Completion of required training will be recorded and monitored through PCH's appropriate learning and governance arrangements.

14. Monitoring and Review

PCH will monitor both the implementation and effectiveness of this Policy. Monitoring will assess whether controls are operating as intended, concerns are identified and managed appropriately, and learning leads to demonstrable improvements. Evidence considered will include:

- Progress against commitments contained in PCH's annual Slavery and Human Trafficking Statement;
- Significant or recurring risks across PCH's workforce, services, homes, commercial premises and supply chains;
- Lessons identified from concerns, incidents, assurance activity and partnership working;
- The number and themes of modern slavery concerns safeguarding referrals and reported incidents, where it is appropriate and lawful to report this information;

- Completion rates for required induction, awareness and enhanced training;
- Evidence that concerns have been appropriately recorded, triaged, escalated and concluded;
- The extent and outcomes of proportionate supplier due diligence and assurance activity;
- Relevant findings from whistleblowing, safeguarding, supplier-management, audit and risk-assurance activity; and actions and improvements agreed, implemented and closed.

The cross-functional Modern Slavery Policy and Assurance Group will review effectiveness at least annually. Progress, significant issues, identified workforce and supply-chain risks, and agreed actions will be reported through PCH's governance arrangements, including the Audit and Risk Committee, with additional escalation where a significant incident or risk arises.

The measures used will be reviewed periodically to ensure that they remain proportionate, meaningful and capable of providing an appropriate line of assurance to the Audit and Risk Committee and the Board.

15. Related Documents

This Policy should be read alongside:

- Anti-Fraud, Bribery and Corruption Policy
- Recruitment and Selection Policy
- Risk Management Policy
- Staff Code of Conduct
- Safeguarding Policy
- Slavery and Human Trafficking Statement
- Supply Chain Code of Conduct
- Supply Chain Policy
- Tenancy Allocation Policy
- Whistleblowing Policy
- Plymouth City Council Tackling Modern Slavery and Human Trafficking Toolkit.

Policy Approval

Version	Date	Approved By
1.0	07th October 2026	Audit and Risk Committee