

# Plymouth Community Homes

## Modern Slavery Act 2015 Statement

October 2023 to September 2024

Plymouth Community Homes Limited (PCH) is a community benefit society with approximately 16,000 affordable homes in Plymouth. We also develop housing for rent and sale. We aim for the highest standards in how we run our business and, in our employment, tenancy and supply chain practices. PCH and our subsidiaries, PCH Energy Company, and PCH Regeneration Company, support the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

This statement summarises our approach and the actions we continue to take in our own company and in our supply chain.

### **Recruitment**

When we recruit at PCH we ensure people are entitled to work in the U.K through careful check and validation of their right to work documents and we help safeguard employees from any abuse or coercion once in our employment by giving them full contracts and employment rights.

### **Tenancy Management**

Residents bid for properties through Devon Home Choice, identification checks are completed prior to any bids. When signing up new tenants at PCH, we make sure people are who they say they are by carrying out background and photo identification checks. We also visit new tenants four times in their new property within the first year. Housing management staff keep an eye on external issues or changes with our properties and tenants. We always investigate any allegations made by residents or the wider community about potential tenancy fraud. We work with partners across the city and report safeguarding concerns to Social Services and process safeguarding referrals when appropriate.

### **Commercial Properties**

We recognise the potential risk associated with some businesses and our commercial staff are trained and experienced to manage these properties and maintain vigilance to any indicators of modern slavery.

## Supply Chains

PCH has an extensive supply chain, and we buy goods, services and works of circa £ 50M (2022/23). We work with many different suppliers and partners. Some of our suppliers may sub-contract work or rely on recruitment agencies to supply temporary or permanent staff. By the nature of their business, some of our suppliers are potentially at higher risk than others.

Through our vendor management and sign-up processes, we reinforce that all our suppliers must comply with the requirements of the Modern Slavery Act 2015. We are focusing on managing our existing contracts to ensure that we have sufficient knowledge and information to prevent, as far as reasonably possible, any instances of Modern Slavery. Segmentation of our supply chains allows us to identify potential high-risk suppliers and ensure robust checks are undertaken before any contracts are entered into. We train our staff to improve awareness of indicators of exploitation and how to report any instances or suspicion of illegal activity.

Within our tender processes we require all suppliers to provide a signed declaration that they fully comply with the requirements of the Modern Slavery Act 2015.

We carry out the following preventative activities:

- Making our staff, residents and leaseholders aware of the Modern Slavery Act 2015, including the definitions of slavery and human trafficking.
- Providing refresher training on Modern Slavery to our staff.
- Telling staff what to do if they suspect a case of slavery or human trafficking.
- Ensuring all references in the recruitment process are followed up.
- Conscious monitoring of excessive noise and/or waste in our communities that might indicate that illegal sub-letting activities are carried out.
- Making compliance with the Modern Slavery Act 2015 a mandatory requirement for all suppliers and checking this on supplier set up for new suppliers.
- Refreshing supplier commitments to abolishing modern slavery
- Managing contracts carefully and keeping in close contact with suppliers to ensure indicators of modern slavery risks are identified.
- Operating a whistleblowing policy, so that all employees know that they can raise concerns about how colleagues are being treated, or practices with our business or supply chains without fear of reprisals.

Signed



Jonathan Cowie

Chief Executive Officer

October 2023