

# **Plymouth Community Homes**

## **Slavery and Human Trafficking Statement**

This statement is made under section 54(1) of the Modern Slavery Act 2015. It constitutes our Group's modern slavery and human trafficking statement for the financial year 1<sup>st</sup> April 2024 to 31<sup>st</sup> March 2025.

### **Overview & Organisation's Structure**

Plymouth Community Homes (PCH) is a leading provider of social and affordable housing in Devon and Cornwall. Our team of over 700 staff, supported by our contractors and suppliers, manage over 16,000 properties across the region.

As a registered not-for-profit society under the Co-operative and Community Benefit Societies Act 2014, we manage and 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 and prevention 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.

### **Our policies and procedures**

We have an extensive, robust framework of policies, procedures and contractual requirements in place which contribute towards the prevention of slavery or human trafficking within our organisation and our supply chains. These include, but are not limited to, areas such as housing management, risk management, safeguarding, health and safety, recruitment, whistleblowing, procurement, terms and conditions and codes of conduct for staff, suppliers and contractors, as well as stringent and extensive due diligence and checks carried out when recruiting staff or engaging suppliers or contractors.

### **Recruitment Practices**

We are committed to ensuring that our recruitment processes are fair, transparent, and free from any form of modern slavery or human trafficking. To safeguard against exploitation:

- We conduct right to work checks for all employees, including verification of identity and right to work in the UK.
- Our payroll practices detect signs of forced labour, such as shared bank accounts.
- All recruitment agencies and labour providers must adhere to this Modern Anti-Slavery statement, which forms part of the contractual agreements.

- We operate a whistleblowing policy that enables employees to report concerns confidentially and without fear of retaliation.

### **Training & Awareness**

We recognise that raising awareness among our employees is critical to identifying and preventing modern slavery. Our approach includes:

- Training for all employees, covering the definition of modern slavery, key indicators, and reporting procedures.
- Distribution of awareness materials to reinforce key messages.
- The Anti-Fraud, Bribery and Corruption Policy which is part of a suite of policies is shared with new employees at the point of on-boarding.

### **Tenancy Management**

Residents bid for properties through Devon Home Choice, and thorough identification checks are completed prior to any bids being accepted by our Housing Choices team. 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 our commercial properties and maintain vigilance to being alert to any indicators of modern slavery.

### **Procurement and Supply Chain**

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 focus 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 or human trafficking. 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 and follow our Code of Conduct which applies to them and their supply chain.

### **Activities During 2024/25**

- 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 that their latest Modern Slavery Statement is provided as part of their tender submission.
- 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.
- We have formed links with other housing associations to share information about best practices in tackling modern slavery.

### **Future Actions 2025/26**

The planned actions for 2025/26 will continue to focus on our high-risk areas in operations and procurement, along with a focus in enhancing staff awareness.

- We will continue to monitor our 'at risk' suppliers to ensure they remain fully compliant with the Act, with specific actions on our vehicle washing providers to ensure ongoing compliance.
- We will continue to provide awareness training for all staff and tailored training for key staff and managers including improving internal awareness of modern slavery risks by supporting and promoting the annual event of **Anti-Slavery Week** culminating on the 18<sup>th</sup> October Anti-Slavery Day.
- A review of our policies and codes of conduct with a view to launching a new **Supply Chain Code of Conduct** incorporating the latest advice to ensure our suppliers and supply chain are supporting us in compliance with the Modern Slavery Act.
- A review of our standard terms and conditions of contract to legally obligated our suppliers against the risk of modern slavery in our supply chain.

Signed



Jonathan Cowie  
Chief Executive Officer

Date: September 2025