

Modern Slavery Act 2015 Policy and Statement

Homes and Communities Agency Policy

1. The Homes and Communities Agency (the “HCA”) is the government’s housing, land and regeneration delivery agency, and the regulator of social housing providers in England.
2. The HCA is committed to the highest level of ethical standards and sound governance arrangements and sets high standards of impartiality, integrity and objectivity in relation to the stewardship of public funds and the management of its activities.
3. The HCA adopts zero tolerance to corruption and bribery and this policy is endorsed by our Board.
4. We fully support the government’s objectives to eradicate modern slavery and human trafficking.
5. Our annual statement will provide information to supplement this policy, including details of our activities and supply chains and actions we are taking to support government.
6. We call upon all organisations we engage with to influence their global supply chains by improving transparency and accountability; and together we can help the government eradicate the injustice and brutality of modern slavery and human trafficking.

Kevin Parry
Chairman
31 March 2016

Colin Molton
Interim Chief Executive
31 March 2016

Homes and Communities Agency

Slavery and human trafficking statement 2015/16

1. The Homes and Communities Agency (the “HCA”) is the government’s housing, land and regeneration delivery agency, and the regulator of social housing providers in England.
2. We engage with a large number of private and public sector organisations in pursuit of our regulatory interventions and our investment, procurement and land disposal activities.
3. Our activities are usually undertaken at arms-length and take place solely in England. Our investment model is to support housing and economic growth using Delivery Partners, such as registered providers of social housing, house builders and developers and other key delivery partners in the public and private sector.
4. We occasionally undertake activities by partnering with local authorities and developers within a special purpose or joint venture partnership organisation; and where appropriate we will undertake direct development using Delivery Partners or construction companies procured for that purpose.

Supply chain policy

5. Our procurement activities take place in England; and our contractors and suppliers are predominantly UK and EU based.
6. We typically host 85 competitive procurements annually, each with an award value in excess of £10,000; and our total procurement spend is in the region of £120m.
7. We place general reliance upon the Crown Commercial Service (“CCS”) and government procured supply chains for our consumable goods and operationally-focused services. In a typical year we procure £6m of goods and services through CCS.
8. In our own right we maintain a number of legal, property and construction-related UK procurement Frameworks, which are made available to the wider public sector.
9. Our Frameworks enable users to draw-down professional multi-disciplinary services and development expertise. This includes the services of development or construction companies, with their associated goods, materials and labour-related supply chains. In a typical year we procure £30m of works and services through our Frameworks.
10. In addition to the above mentioned CCS and Framework purchasing, we procure circa £47m worth of services and works from small and medium-sized enterprises (SME companies), predominantly based in the UK or the EU.

11. We do not maintain a goods, materials or direct-labour supply chain Framework.
12. We expect our Delivery Partners, organisations within our Frameworks and other companies we engage with to ensure their goods, materials and labour-related supply chains:
 - **Fully comply with the Modern Slavery Act 2015;** and are
 - **Transparent, accountable and auditable;** and are
 - **Free from ethical ambiguities.**
13. Through this statement we encourage Delivery Partners, organisations within our Frameworks and other companies we engage with to read and apply as appropriate [‘Advancing Responsible Business Practices in Land, Construction and Real Estate Use and Investment’](#), a joint publication between the United Nations Global Compact and the RICS.
14. Individuals with evidence of non-compliance with the Modern Slavery Act in connection with HCA supply chains are encouraged to follow the reporting procedure outlined within our [Anti-bribery and Corruption Policy](#) or use the [national reporting service](#).

Steps taken by the HCA since July 2015 – Year 1

(A) Management responsibility and general awareness

We have:

- Agreed management responsibility for this policy and statement and received unanimous endorsement from our Executive Management Team and our Board.
- Raised general organisational awareness by circulating an article to all staff explaining progress in preparing this statement.

(B) Risk assessment

We have:

- Undertaken an assessment using our professional legal, risk and procurement teams to determine our risk exposure.
- Established that our primary risk is association with a Delivery Partner, Framework participant or company with an ambiguous or non-compliant supply chain.
- Included the Modern Slavery Act 2015 within our statutory and regulatory Compliance Risk Register to ensure the risk continues to be flagged, assessed and appropriately addressed.

(C) Risk mitigation

We have:

- Added a provision to our tender documentation which includes the mandatory exclusion of any bidder who has been convicted of an offence under section 1, 2 or 4 of the Modern Slavery Act 2015.
- Obtained legal advice and we will seek to impose in new contracts that we enter into provisions for termination in the event of a modern slavery or human trafficking compliance breach by the supplier.

Steps to take – Year 2

(A) Management responsibility and general awareness

We will:

- Report progress to our Executive Management Team and our Board.
- Raise awareness of this published statement by notifying organisations in our Frameworks, Delivery Partnerships and other companies with which we regularly engage.
- Prepare the second annual statement.

(B) Risk assessment

We will:

- Commence a review exercise of this policy against our activities to establish whether the approach we have taken follows emerging best practice by:
 - Assessing and interpreting any recent or emerging case law and best practice; and
 - Benchmarking our activities against statements and action plans undertaken by similar public and private organisations.
 - Re-evaluating the risk of non-compliance as part of our cyclical Compliance Risk Register assessment.

(C) Risk mitigation

We will:

- Act promptly where a compliance breach has been identified or flagged.
- Continue to feed-back lessons learnt into the compliance risk management process.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Homes and Communities Agency slavery and human trafficking statement for the financial year ending 31 March 2016.

Homes and Communities Agency

Date: 31 March 2016