



# Modern Slavery Act 2015 and Human Trafficking Compliance Statement

## Statement of Intent

All entities within the Sovini Group, of which the Carroll Group is part, are committed to promoting the highest standards of ethical business practice from our recruitment and employment activities, areas of service delivery, through to the behaviours and procedural arrangements we expect from our supply chain partners.

This includes being vigilant to the human suffering caused by those involved in acts of modern slavery and human trafficking activities. We welcome the increased emphasis and need for positive action that the Modern Slavery Act brings to all the parts of our Group structure and those with whom we choose to do business.

Our aim is for continuous improvement in this area and we will build on our existing strong emphasis on promoting employee welfare, stringent selection procedures and monitoring of our supply chain, through to our zero tolerance stance for any form of discrimination or Human Rights breaches.

## The Sovini Group Structure and Business Activities

The Sovini Group brings together like-minded organisations from the 'non-for profit' and commercial sectors in a mutually beneficial and collaborative business partnership. With the benefits of a number of shared central services, each Group entity retains independence whilst working towards commonly held codes of business practice and sound governance arrangements.

The Group entities have also adopted a common purpose, ethos and work towards shared values which incorporates a co-ordinated response to modern slavery and human trafficking issues.

Within the Group current business activities include the provision of homes for rent, part-ownership, outright sale and associated housing management and maintenance services. We also have businesses which deliver all aspects of property maintenance, repair and building materials supply both inside and outside the Group.

Through recent expansion the Group now also incorporates a charitable arm and has companies delivering specialist services in the areas of waste management, scaffolding, asbestos management and ground-works / infrastructure for telecommunication services.

## Our Supply Chain Management Arrangements

Any supplier or sub-contractor that we choose to work with is subject to a comprehensive assessment process prior to their appointment, to ensure their operations are in line with our ethical business standards. This includes:

- Disbarring any company from the approved supplier list for any prosecutions or judgements for breaches of the Public Contracts Regulations 2015, Equality Act 2010, Human Rights Act 1998 or any court or industrial tribunal, including modern slavery or trafficking offences
- Ensuring companies have equality, diversity and inclusion Policies in place including employee monitoring or are willing to work towards similar Sovini Policies
- Procedures for on-going checking and verification of their workforce to ensure there are no concerns over modern slavery or human trafficking

Once approved, suppliers and sub-contractors are subject to regular monitoring and review to ensure they maintain the standards required and are removed where breaches are discovered, with relevant investigation agencies informed accordingly.

In parts of our Group that are involved in importing timber products we also maintain full 'Chain of Custody' registrations to ensure the products supplied have sound environmental provenance and there are no child labour or worker exploitation issues.

## **Our Organisational Response**

As part of comprehensive pre-employment checks we ensure all prospective employees have indefinite leave to remain within the UK and appropriate permits to work, where these are required.

If we were to encounter any incidents where papers are not in order or there is a suspicion that the applicant may be subject to trafficking or modern slavery arrangements we will make alerts to the relevant enforcement agencies whilst offering support to the individuals concerned.

Each company within our Group structure has in place a comprehensive suite of Human Resources Policies (copies available on request) to protect workers and ensure fair and consistent treatment during their time of employment with Sovini companies.

All our organisational Policies are subject to Equality Impact Assessments when they are being developed or reviewed and we will consider any implications they have in relation to the Modern Slavery Act compliance requirements.

We employ a 'Group Champion' to monitor our compliance arrangements and ensure we strive for continuous improvement in our response to modern slavery and trafficking issues, alongside responsibility for reporting on Corporate Social Responsibility actions.

If during the course of day-to-day working activities Sovini Group employees are made aware of a suspected incidence of modern slavery or human trafficking their immediate response will be to inform the Police on 101 or as a 999 call if victims are in immediate danger.

Where there are suspicions that companies Sovini Group members work with are involved in organised modern slavery or trafficking, these concerns will be forwarded on to the Group Champion who will coordinate a response to the National Referral Mechanism for advice and guidance.

We have incorporated modern slavery and human trafficking awareness within our 'Safeguarding Training' delivered to key front line staff including signs of danger and mechanisms for reporting concerns.

As part of our Group procurement arrangements we now employ an officer with specific responsibility for 'reality checking' the arrangements of our supply-chain partners including compliance with the Modern Slavery and Human Trafficking Act.

## **Planned Actions**

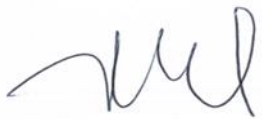
We will continue to raise awareness of modern slavery and human trafficking issues via an all staff publication 'E&D Focus On' which highlights a 'what you need to know' about relevant equalities issues.

We have also re-established a Group-wide Equality, Inclusion and Diversity Steering Group which will ensure Modern Slavery and Human Trafficking issues are incorporated into a planned strategic document and approach to be adopted in 2019/20.

We will monitor our response to these issues by inclusion in our risk registers and future resource planning and our management boards will receive annual progress reports on actions taken to prevent its occurrence.

Signed:

Dated: 30<sup>th</sup> July 2019

A handwritten signature in black ink, appearing to read 'RW', is written on a light-colored rectangular background.

**Roy Williams**

Group Chief Executive Officer