

# Modern Slavery Act Statement 2018

## **Overarching Statement**

The Modern Slavery Act requires Metropolitan to disclose information relating to the steps we have taken to ensure there is no slavery or trafficking in its own business or supply chains.

## **Meaning of Slavery and human trafficking**

Our understanding of slavery and human trafficking is based on the definitions set out in the Modern Slavery Act 2015 “slavery, servitude and forced or compulsory labour”

## **Our Business**

Metropolitan's roots are in the 1950s, when a Housing Association was set up in London to provide good quality, affordable housing for immigrants from the West Indies. In 1963, Metropolitan Housing Trust (Metropolitan) was formally set up as a Housing Association.

Today Metropolitan is a leading provider of integrated housing services, care and support and neighbourhood investment. We manage over 38,000 affordable homes for rent and sale, along with a range of care and support services where we support thousands of people to live independently across London, the Midlands and the East of England. The people we work with have a diverse range of needs, so we tailor our services to each individual, working with them to achieve their potential.

In total we serve over 80,000 customers across London, the East of England and the East Midlands. We are a developer of new homes with a plan to deliver 3,300 new affordable homes in the next five years, spending over £730m. Metropolitan is a member of the National Housing Federation and the g15, which represents London's 15 largest housing associations and houses one in 10 Londoners.

## **Our Supply Chains**

As a Registered Social Landlord Metropolitan is a contracting authority and therefore subject to the Public Contract Regulations 2015. We are governed by directives to ensure that the principles of non-discrimination and transparency are upheld with the aim of fostering a common internal market. We are prohibited in relation to discrimination on the basis of nationality, grant freedom of establishment, and establish the freedom to provide services. In order to cultivate an internal market, all public procurement policies must comply with these principles. Metropolitan advertises its sourcing opportunities in the Official Journal of European Union (OJEU). We source our supplies, services and works from third party suppliers principally within Great Britain.

For the purposes of this statement we include evaluation criteria relating to the Modern Slavery Act within our procurement documents and robust clauses within all forms of contracts.

## **Relevant Policies**

Clear organisational policies demonstrate our commitment to ensure that there is no slavery or human trafficking within our business or supply chains.

Our relevant policies include:

Code of Conduct for Employees

Code of Conduct for Temporary Workers

Code of Purchasing Behaviour

Grievance Policy

Whistle blowing policy

Remuneration policies

Diversity policies

In our Code of Conduct for Employees policy we have a clear set of principles and guidance about what is expected of our employees in their day to day work, and in their dealings with residents, service users, colleagues, contractors, partners and other stakeholders. The Code of Conduct covers personal conduct - Discrimination and Harassment, Human Rights and Equality and Diversity. We also stipulate mandatory training to support employees' understanding of their expected behaviour in relation to personal conduct.

Metropolitan is committed to achieving the highest possible ethical standards in all its business activities. Our 'Won't Walk By' (whistle blowing) policy sets out our approach to speaking out on issues of concern. We enable and encourage staff and others to come forward and express any serious concerns regarding suspected misconduct or malpractice by our employees, ex-employees, suppliers or contractors.

### **Risk Assessment and Due Diligence**

The risk of slavery and human trafficking within our organisation is avoided and mitigated by policies and procedures.

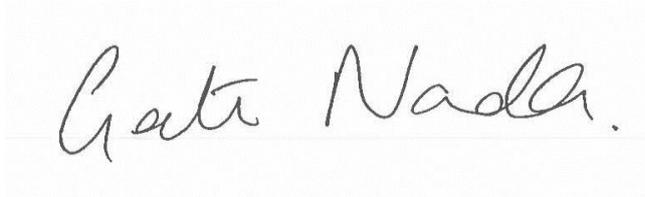
We consider our greatest risk of slavery and human trafficking to be in the sourcing of our supply chains when undertaking procurement activities. We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

**As part of our continued commitment to identify and mitigate risk** we use the central government procurement documents which address modern slavery. Where applicable our procurement documents request transparency in relation to working conditions including health and safety, fair remuneration, non discrimination and forced, cheap labour. We continue to expect our incumbent and new suppliers to have up to date suitable anti-slavery and human trafficking policies and processes.

### **Training and Awareness**

All employees within the procurement department have undertaken Ethical Procurement and Supply training which incorporates modern slavery issues.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement.



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