



Modern Slavery Statement April 2024 until March 2025

Modern Slavery and human trafficking statement for Cornwall Housing Limited for the period April 2024 until March 2025.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and outlines the steps that Cornwall Housing Limited has taken over the 2024/25 financial year to ensure that slavery and human trafficking are not taking place within Cornwall Housing or its supply chain. This statement covers the financial period from 1 April 2024 to 31 March 2025

Background

Cornwall Housing Limited (CHL) is an arms-length management organisation (ALMO) created by Cornwall Council. The organisation is non-profit making and is 100% owned and controlled by Cornwall Council. CHL manages, maintains and improves council houses and estates on behalf of the council. CHL is a registered provider of social housing with the Regulator of Social Housing.

CHL aims to promote the highest standards in how the business is run and, in the employment, tenancy and procurement practices. CHL supports the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

This statement summaries the approach and the to be taken action in the next year in our own company and in our supply chain.

Our approach to modern slavery and human trafficking

CHL operates a zero-tolerance approach to modern slavery and human trafficking. CHL expects all of Directors, Officers, employees, suppliers, contractors, the supply chain and any other third-party engaged, to adhere to and comply with the zero-tolerance policy. CHL understands the importance of ensuring that robust systems are in place to identify and address any risks of modern slavery and/or human trafficking. CHL ensures that procedures are in place to identify, and where necessary, address such risks. This statement sets out the measures that CHL have taken to address modern slavery and human trafficking in the higher risk areas of the organisation.

Recruitment and Employment

CHL has employment practices, procedures and diversity policies in place to help ensure the fair

recruitment and treatment of employees. The recruitment policies are designed to ensure that all prospective employees have the right to work in the UK and to safeguard employees from coercion.

CHL is committed to paying fair wages and all staff are paid the Real Living Wage as a minimum. This commitment is shared with the Shareholder, who is an accredited Living Wage employer.

Prior to starting employment, CHL will verify and obtain evidence that a new employee has the right to work in the UK. Where there are additional requirements for employment (for example a Disclosure and Barring Service (DBS) check) then further forms of identification will be obtained and verified before employment commences.

Use of agency staff may be arranged through external recruitment agencies. Before any agency staff are engaged, CHL would require assurance that the individual has the right to work in the UK. Where the relevant employment checks cannot give the level of assurance required, an individual would not be invited to undertake work in an agency capacity. CHL continues to review the contractual relationships with the external recruitment agencies. During the 2024/25 financial year, we have made our agency on-boarding process more robust through the introduction of additional governance through a preferred suppliers list.

Service Delivery

In order to deliver services, employees are often required to visit residents in their homes. Those employees may witness, become aware of or suspect modern slavery, human trafficking, abuse and/or coercion when delivering our services. It is crucial that they are able to identify potential occurrences of modern slavery, human trafficking and other safeguarding issues and understand how to report these concerns without delay so that appropriate action can be taken. There are policies in place (such as our Speaking Up policy and Safeguarding policy) as well as an e-learning programme to provide guidance to our staff on how to identify and report these issues. These policies are reviewed annually.

Procurement and Supply Chains

CHL spends approximately £45 million annually on goods, services, and works. Our supply chain is diverse and includes sub-contracted works and services, professional services, construction materials, software, PPE and workwear, office equipment, and cleaning products. We are committed to ensuring that our procurement practices are ethical, sustainable, and aligned with our zero-tolerance approach to modern slavery and human trafficking. CHL obtains its procurement service through Corserv and adopts the policies and procedures available through that Service Level Agreement. To uphold these values, we have implemented a robust procurement strategy that supports ethical operations, contributes to the local economy, and promotes sustainability. Our approach includes the following key measures:

- **Supplier Expectations:** We require all subcontractors, suppliers, and consultants to take

proactive steps to prevent modern slavery and human trafficking within their operations and supply chains. This expectation is embedded in our tendering processes and contractual agreements.

- **Contractual Safeguards:** All contracts include clauses mandating compliance with modern slavery legislation and our internal policies. We reserve the right to terminate contracts where a supplier is found to be in breach of these obligations.
- **Due Diligence:** Prior to entering into contractual relationships, we conduct appropriate due diligence to assess the risk of modern slavery and ensure suppliers meet our ethical standards.
- **Risk-Based Questionnaires:** In 2024/25, we introduced a supplier questionnaire for higher-risk procurements, particularly where goods may be sourced from outside the UK or where there is a high labour requirement. This tool helps us assess how suppliers manage modern slavery risks within their own operations and supply chains.
- **Legal Compliance:** We require suppliers that are legally obligated to publish a Modern Slavery Statement to confirm their compliance with Section 54 of the Modern Slavery Act 2015. Any concerns identified during this process prompt a review of our ongoing relationship with the supplier.
- **Fair Payment Practices:** We aim to pay all valid and undisputed invoices within 30 days. Timely payments help reduce financial pressures on suppliers, which can otherwise increase the risk of worker exploitation.
- **Fair Wages:** We expect our suppliers to pay their staff fairly. Contracts include a requirement that all personnel delivering services to CHL are paid, at minimum, the Foundation Living Wage. Where concerns arise regarding compliance, we seek assurance from the supplier and may reconsider the relationship if satisfactory evidence is not provided.

Training

In 2024/2025 CHL reviewed the e-learning programme, for new starters and its refresh programme. CHL provides e-learning through its Learning Management System, Oracle, obtained through Corserv. CHL has mandatory training on safeguarding and radicalisation. This work is ongoing into the 2025/2026 financial year. CHL has safeguarding advocates who have received specialist safeguarding training to help identify any risks which could amount to modern slavery and/or human trafficking.

Policies

CHL has implemented a number of corporate policies which are designed to identify and address modern slavery and human trafficking issues. These policies include Speaking Up (Whistleblowing), Anti-bribery, Corruption and Fraud, Contractor Code of Conduct, Safeguarding and DBS. All policies are annually reviewed and updated where necessary.

The Speaking Up Policy reiterates a commitment to the highest possible standards of openness, honesty and accountability. 'Whistleblowing' is the term used when an employee passes on

information concerning wrongdoing. Often referred to as 'making a disclosure' or 'blowing the whistle'. The Policy applies to all employees of CHL. All individuals to whom the Policy applies can utilise it to report any evidence or allegations of modern slavery or human trafficking in relation to CHL activities or supply chains.

Governance, Effectiveness and Review

The detection of any modern slavery issues falls into the remit of the Board via the Audit and Risk Committee's operations and is discussed on a regular basis. The Committee are responsible for reviewing the modern slavery statement and policy annually. Modern slavery and human trafficking issues would be identified as part of our annual internal audit programme, the findings of which are overseen and scrutinised by the Committee. CHL will continue to review the effectiveness of the internal audit programme and adopt policies and procedures where required.

Further steps

For the financial year 2025/26 and beyond CHL intends to take further steps to combat modern slavery and human trafficking in its supply chains. These steps include:

- Continuing to review and update key policies, including Speaking Up (Whistleblowing), Modern Slavery and Safeguarding on an annual basis and seeking Board approval.
- Continue to refine and enhance core mandatory e-learning training programme around key policies including the introduction of an enhanced Learning Management System to support e-learning
- Develop reporting metrics to increase our assurance that modern slavery and human trafficking issues are being sufficiently monitored throughout our business

Our commitments:

- Continue to make our staff, residents and leaseholders aware of the Modern Slavery Act 2015, including the definitions of slavery and human trafficking.
- Continue to tell staff what to do if they suspect a case of slavery or human trafficking.
- Work with current suppliers who provide us with temporary staff to ensure they also comply with this Act.

Signed:

A handwritten signature in black ink, appearing to be a stylized 'S' followed by a flourish.

On behalf of the Board of Cornwall Housing

Dated: 12 November 2025