**Elm Trees Retirement Living Limited**

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**Elm Trees Retirement Living Limited**

**Slavery and Human Trafficking Statement 2019**

We are committed to improving our practices to combat slavery and human trafficking.

**Organisation’s Structure**

We are a provider of supported sheltered housing for older people. We have 13 full time employees with an annual turnover of £500K.

**Our Business**

Our business covers the Solent area and in our Group we operate four houses with full time live in staff.

**Our supply chains**

Our supply chains include food, consumables, utilities and carers (when needed). We also sub-contract labour through the acquisition of services relating to property construction and ongoing maintenance and repair.

**Our policies on slavery and human trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy (which can be found on our website) reflects our commitment to acting ethically and with integrity in all our business relationships and to identifying areas of risk and working with our suppliers to eliminate modern slavery from our supply chains.

**Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk we have in place systems to:

* Review central government guidance on occupations most at risk.
* Analyse our supply chains in order to identify areas of high risk.
* Ensure that all potential and existing suppliers are aware of our policy relating to modern slavery.
* Undertake to only contract with those organisations whose approach to modern slavery coincides with our own.
* Protect whistle blowers

**Supplier adherence to our values**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme. This consists of:

* On appointment of a new supplier, ensuring that our Modern Slavery Policy is clearly and effectively communicated.
* All new suppliers evidencing commitment to eliminating modern slavery from their supply chains prior to commencement of contract.
* Continuously monitoring of our supply chains and reviewing suppliers’ policies towards modern slavery through the ongoing contract management process.
* Working with our suppliers to ensure that any areas of concern are identified quickly and remedial measures are implemented effectively and as a matter of urgency.
* We will not hesitate to report such offences against the Act to the relevant legal enforcement agencies.
* As a minimum requirement, we would expect all our suppliers, their agents and sub contractors to adhere to the following code of conduct.
* All workers to be paid the prevailing minimum wage applicable to the location in which they are employed. All wages to be payable in full, excluding deductions, unless expressly agreed with the worker.
* All workers to have a contract of employment, setting out terms and conditions of employment, working hours and grievance procedures.
* Working conditions and safety provisions should be regularly inspected by our supplier or their agent to ensure the health and safety of workers.
* A worker’s documents will remain their property and are not to be retained by their employer; all workers shall be free to leave at any point.

**Training**

To ensure a high level of understanding the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

**Further Steps**

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains, we intend to take the following further steps to combat slavery and human trafficking.

We will increase the number of areas which are put out to formal tender to ensure that suppliers are under contract and bound to adhere to modern slavery policies.

We will nurture existing supplier relationships in high risk areas with the aim of reducing reliance on products or services where geographical location or occupations are susceptible to modern slavery.

We will review operational processes with the aim of reducing the number of temporary workers.

This statement is made pursuant to section (54(1)) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2019.