

Slavery and Human Trafficking Statement

For the Financial Year ending 31 March 2023

Introduction

Moat is fully committed to combatting slavery and human trafficking and is committed to ensuring transparency of our supply chains. This statement sets out our commitment to recognising and mitigating risks of modern slavery in our business activities and within our supply chains.

Outlined below are the steps we have taken to target Modern Slavery for the financial year 2022-23, which covers the period 01 April 2022 to 31 March 2023, along with details on the further actions we will take in the new financial year. We will continue to examine the effectiveness of our approach, to ensure continuous improvement.

Moat's structure and business

Moat Homes Ltd is an exempt charity, and Registered Provider of Social Housing (registered in England), principally involved in the provision of housing and support to people in need.

The Moat group consists of two registered providers (Moat Homes Limited and Moat Housing Group limited) and one active company (Moat Homes Finance plc). Moat Homes Limited ("MHL") is the parent company of the Group and a charitable registered provider regulated by the Regulator of Social Housing (RSH).

Our purpose is to open doors to better lives by being an innovative social business, expert in delivering homes and developing communities across the South East of England including Essex, Kent, Sussex and the South East of London. We reinvest all financial surpluses to provide additional affordable homes and to provide quality estate management services which are reliable and offer value for money.

Moat owns and manages over 21,000 homes and employs over 410 staff. Our principal activities are the provision of general needs and affordable rent homes for people who cannot afford to rent or buy in the open market and the provision of low cost home ownership and shared ownership.

Our supply chains include goods and services for the construction, repair and maintenance of residential homes. We also purchase goods and services to facilitate running our office premises.

Risk assessment

The areas within our business where there is a high risk or possibility of encountering modern slavery are procurement, human resources people services and in front line customer facing roles. Sectors within our supply chains where there is a high risk of modern slavery include construction and cleaning services.

As a major housing provider, we have vetting processes in place which monitor the people whom we house, as well as ensuring, through our tenancy audits, that our properties are not used for the purposes of trafficking or allowing modern slavery to be used.

As we are based in and operate solely within the UK, we have identified that our overall exposure to the risk of slavery and human trafficking is quite low. However, within our business, particular attention is paid to construction contracts and the use of sub-contracted labour.

We already take action to ensure that we are compliant with employment law. Many of our contractors and suppliers are in the UK and are also required to follow UK employment law.

Provision of housing

As a major housing provider, we have vetting processes in place which monitor the people whom we house, as well as ensuring, through our tenancy audits, that our properties are not used for the purposes of trafficking or allowing modern slavery to be used.

Due diligence

We are committed to ensuring that there is no modern slavery in our supply chains or in any part of our organisation. Our systems and controls to identify and mitigate risk during procurement, either from a framework, or by buying direct from the open market, include:

- a Supplier Code of Conduct, which requires our partners to sign up and commit to ensuring that no modern slavery activities are carried out within their supply chain. This includes reference to no forced or involuntary labour, humane treatment, workplace equality, freedom of movement and personal freedom and other expected values and employment practices.
- standard terms and conditions of purchase, which make more explicit reference to the Modern Slavery Act 2015, as well as social and labour law more generally.
- our Procurement Policy and Framework, which ensures that our commitment to preventing slavery and human trafficking is clear and setting out our expectations of contractors and suppliers.

As an employer, we are committed to paying the National Living Wage and we regularly review our terms of employment to ensure that they comply with all relevant legislation. During the recruitment process, we conduct thorough checks to ensure that our colleagues have the relevant documentation and have the right to work in the UK.

Training

We continually seek ways to raise our staff's awareness of the risks of modern slavery and human trafficking via our learning programmes and our communication channels. We will continue to provide relevant information and training to staff during 2023/24 on the topic as part of our ongoing work to manage these risks, such as raising awareness of the links with money laundering and human trafficking, and what we can do to prevent it. We will also continue to encourage our business partners to provide training to their staff and suppliers.

All colleagues are required to undertake mandatory e-learning on slavery and human trafficking as a minimum learning requirement for all our employees to help raise awareness. We have supplemented this with bespoke training and awareness developed with our partners, such as the police, for front line customer facing services.

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Modern slavery related policies

Our Slavery and Human Trafficking Statement 2022/23 has been reviewed and developed with due regard to good practice issued by the Home Office.

Moat will only trade with those who comply with our statement on Modern Slavery (as defined in our Code of Conduct for Partner Organisations). We will assess any instances of non-compliance, take appropriate action and report these to the Board. There were no instances of non-compliance during the period covered by this statement.

Moat has a whistleblowing policy in place, which ensures full protection (and anonymity) of staff, should they raise a concern.

Our Safeguarding and Domestic Abuse policies guide and support our work on protecting vulnerable people from abuse in its widest sense.

Measuring effectiveness

Through effective monitoring we work to ensure that modern slavery due diligence is a business as usual activity and that there is a good level of awareness and vigilance across our organisation and our front line services in particular.

This Statement is made under section 54(1) of the Modern Slavery Act 2015. It was approved by Moat's Board on 26 July 2023 and applies to all companies within the Moat Group.



Mary Gibbons
Chief Executive

Date: 26 July 2023