



Key Housing Association Limited

Modern Slavery and Human Trafficking Statement



Key Housing Association Limited

Modern Slavery and Human Trafficking Statement

Introduction

Key supports disabled people and people with long-term conditions throughout Scotland. We work alongside each person we support, and their family, to help them live life to the full.

We have produced this statement in line with our responsibilities under the Modern Slavery Act 2015. It outlines what steps we take to make sure what we do is free from modern slavery and human trafficking.

Modern Slavery

Modern slavery includes exploitative practices like slavery, forced or compulsory labour, debt bondage and human trafficking. In these situations, a person is exploited and cannot refuse or leave. Often, the person faces threats, violence, coercion, deception, or abuse of power.

Victims of human trafficking are often the most vulnerable members of our communities.

About us and how we work

Key is a charity and social care provider. We only work in Scotland; supporting people to live the life they want across 16 local council areas. We are also a housing provider, offering good quality housing and a range of personalised housing solutions.

We act ethically and with integrity in all our business relationships and in our relationships with our employees. We have a zero-tolerance approach to modern slavery and human trafficking.

We do not get any goods and services directly from any countries at a high risk of modern slavery or human trafficking. Our suppliers are entirely UK-based.

The services we use which are at most risk of modern slavery are agency staff providers and property maintenance contractors.

Steps Taken

To reduce the risk of modern slavery in our organisation, we have a robust and transparent recruitment process. This adheres to the Scottish Government's Safer Recruitment guidance and the Scottish Social Services Council's (SSSC) Code of Practice. It also includes robust checks to confirm candidates' right to work in the UK, criminal records checks, and obtaining employment references.

Our employees are employed on terms that are in line with relevant UK legislation. As an employer we:

- aim to offer a secure and safe working environment.
- aim to give development and career opportunities.
- treat employees with respect.
- help employees achieve their maximum potential.
- compensate staff fairly, with salaries paid directly into individual bank accounts.

As a purchaser, we only engage with reputable contractors and suppliers. They must adhere to the relevant regulations and legislation in providing their goods and services.

Agency staff providers we use must adhere to the same high standard of recruitment practices as us. They must also abide by the SSSC Code of Practice.

Our procurement strategy and processes are designed to ensure we comply with legal and regulatory requirements and follow best procurement practice.

Any supplier we use must:

- comply with all relevant legislation and related regulations.
- comply with industry codes of practice.
- be registered with the appropriate governing/regulatory body.
- supply/employ only appropriately trained and qualified staff.

Any supplier we use must specifically comply with the Modern Slavery Act. If they do not, we have the right to end the contract.

Raising Concerns

We have systems in place to support staff to whistle blow, or raise any concerns, and to deal with these promptly and effectively. It is important that our employees feel confident they can report any concerns without any risks, or repercussions.

We will work with, and escalate any concerns to, external agencies, as identified.

Policies

A range of policies help us to lessen the risk of modern slavery within our activities. These include:

- our Recruitment policy.
- our Dignity at Work policy.
- our Equal Opportunities policy.
- our Whistleblowing policy.
- our Procurement policy.
- the Registered Social Landlord's Model Code of Conduct.
- the SSSC Codes of Practice.

Ongoing Commitment

We recognise the need to always be aware of the risk of modern slavery and human trafficking. We continually monitor our processes and will improve these as needed.

In June 2023, the Gangmaster and Labour Abuse Authority (GLAA) reported a significant increase in reports of exploitation within social care. We continue to be vigilant of and raise awareness of these issues.

We will keep our policies and procedures under review over the next financial year. Where needed, we will seek expert advice from organisations such as the Equality and Human Rights Commission and the Trafficking Awareness Raising Alliance. We will also take any further appropriate action to ensure slavery and trafficking are not present in our supply chain or in any part of our own activities.

Approval

This statement relates to the financial year ending on 31 March 2024. It was approved by Key's Board on 21 August 2024 and is signed on their behalf.



Andrea Wood
Chief Executive