

# Slavery and human trafficking statement

## Introduction

Moat is fully committed to combatting slavery and human trafficking and is committed to ensuring transparency of our supply chains.

Outlined below are the steps we have taken to target Modern Slavery for the financial year ending 31 March 2019, which covers the period 01 April 2018 to 31 March 2019, 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 two active companies (Moat Foundation and 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 mission is to be an innovative social business, expert in delivering homes and developing communities across the South East. 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 350 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.

## 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.

## Our supply chain

Moat operates principally in the South East of England: Essex, Kent, Sussex and South East of London. 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. 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, and many of our contractors and suppliers are in the UK, and are also required to follow UK employment law.

We are committed to ensuring that there is no modern slavery in our supply chains or in any part of our organisation and as part of our initiative to identify and mitigate risk during procurement, either from a framework, or by buying direct from the open market, we have reviewed our systems and controls and will be making improvements. These include:

- Referring to our Code of Conduct for Partner Organisations which includes a section on modern slavery activities and by tendering, potential contractors and suppliers are agreeing to adhere to the Code
- Reviewing the terms and conditions of new contracts to make more explicit reference to modern slavery
- Ensuring that all reviews of contract management and performance include consideration of the Modern Slavery Act as an agenda item.

## 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 2019/20 on the topic as part of our ongoing work to manage these risks.

We will also continue to encourage our business partners to provide training to their staff and suppliers.

## Policy review and development

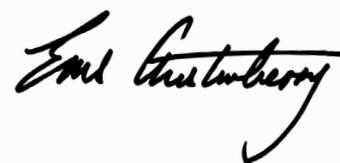
Our Human and Slavery Trafficking Statement 2018/19 has been reviewed and developed with due regard to good practice issued by the Home Office.

## Non-compliance

Moat will only trade with those who comply with our policy 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. However, 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.

This Statement is made under section 54(1) of the Modern Slavery Act 2015. It was approved by Moat's Board on 13 June 2019 and applies to all companies within the Moat Group.



Elizabeth Austerberry  
Chief Executive