



The Homes for Students Limited Modern Slavery and Human Trafficking Statement

March 2022

INTRODUCTION

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the Act) and constitutes our anti-slavery and human trafficking statement for the financial year ended 31 March 2022 and includes the steps we take to address modern slavery issues.

As part of the real estate / student accommodation sector, Homes for Students recognises that it has a responsibility to take a robust approach to slavery and human trafficking, particularly to demonstrate our commitment to the clients who we partner with; the suppliers we work with; the institutions who we affiliate with and the students who choose to make their home with properties managed by Homes for Students Limited.

Homes for Students is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that it does not occur within our business or supply chains.

Within Homes for Students Limited our Managing Director takes board responsibility for our work on addressing modern slavery.

OUR BUSINESS

Homes for Students Limited (HFS) is the UK's largest independent student accommodation provider, operating with international and UK based investors and developers across a multitude of purpose-built student accommodation schemes in UK and Ireland.

We provide an integrated student accommodation management and facilities management service. We provide student accommodation management to direct let, nominated and lease properties across the UK and Ireland.

Homes for Students have 659 employees (as of 31st March 2022) who are all UK and Ireland based. Our employee team work to manage and support the c160 properties in UK and Ireland and c35,000 students who make their homes in the properties managed by us.

ORGANISATIONAL STRUCTURE

Responsibility for the organisation's anti-slavery initiatives is as follows:

- Policies:
 - Kate Forester – Managing Director
 - Simon West – Compliance and Procurement Director
 - Stephanie Wessel - Head of People and Culture

OUR SUPPLY CHAINS

Homes for Students is committed to conducting its business in a socially responsible and sustainable way. Procurement manage the on-boarding of suppliers in which a due diligence exercise is undertaken for each supplier wishing to trade with Homes for Students Limited, which is a requirement under our formal Financial Regulations.

We work with a diverse range of over 500 active suppliers all of whom have to agree and sign up to our *Supplier Code of Conduct*. Every competitive tender includes a requirement for the supplier to sign a *Declaration of Modern Slavery Compliance*..

Our main supply chains fall under the following categories in the main:

- Marketing activities
- Pre-planned, reactive and project maintenance activities
- FM led Contractor services to sustain the integrity of the properties
- Services and Consumables used day to day

Homes for Students have a specific procedure for onboarding suppliers from the high-risk supply chain categories; *Supplier Self-Assessment Questionnaire (MSA)* - this enables us to assess and address modern slavery risks as required under the Modern Slavery Act 2015.

Risk assessments:

We have taken a risk-based approach to identify commodities within our supply chain categories that are a high risk for Modern Slavery and Human Trafficking, as a priority these are:

- Cleaning services; Security; Capital building projects – construction workers; Clothing; Furniture; IT

Homes for Students have conducted a Modern Slavery specific Risk Assessment which has informed us with where we are and what additional actions we need to take to address any potential modern slavery issues arising in our business.

Following this assessment, we have:

- i. Identified the highest risk categories within our supply chain which could potentially expose us to modern slavery and human trafficking
- ii. Updated our supply chain procedures to include a *Supplier Self-Assessment Questionnaire (MSA)* for those suppliers operating within the highest risk categories
- iii. Implemented a new supply chain procedure for suppliers to complete a *Declaration of Modern Slavery Compliance* for all competitive tenders
- iv. Implemented new internal registers to maintain and review audit processes for ii. and iii.
- v. Reviewed our *Recruitment & Selection Policy* to specifically reference the risk with modern slavery and human trafficking with our own resourcing engagements, including the use of any 3rd party agency workers.
- vi. Developed a new e-learning curriculum; “Modern *Slavery*” course.

Relevant policies

The organisation operates the following policies and procedures, that underline its approach to the risk of modern slavery, and the steps to be taken to prevent slavery and human trafficking within its operations.

Reference	Document Name	Notes
CS-CP-05	Equal Opportunities and Diversity Policy	The company’s commitment to Equal Opportunities and Diversity
CS-CP-10	Recruitment & Selection Policy	Company standard setting in this area
CS-CP-12	Supply Chain Procurement Policy	Company standard setting in this area
CS-CP-21	Anti-Bribery Policy	We operate a zero-tolerance approach to the making or receiving of bribes or corrupt payments
CS-CP-24	Anti-Fraud and Corruption Policy	Our commitment to the prevention and detection of fraud and corruption
CS-CP-25	Whistleblowing	Whistleblowing policy
CS-SC-01	Procurement Manual	The principals, policies and procedures to be followed
CS-SC-09	Supply Chain Process	Detailed methodology for our supply chain strategy
CS-SC-10	Justification for New Supplier Request Form	Business case for all internal stakeholders
CS-SC-11	Quality Audit for Contractors and Sub Contractors	Contractor works inspection (on-site)

CS-SC-15	Supplier Supply Chain Questionnaire	Formal company onboarding of suppliers
CS-SC-16	Sub-Contractor Supply Chain Questionnaire	Formal company onboarding of contractors
CS-SC-20	Approved Sub-Contractor / Suppliers Annual Review	Annual review & requirements audit

Supply chain investigations/due diligence

Responsibility for the organisation's supply chain investigations/due diligences is as follows:

- Simon West – Compliance and Procurement Director
- Juan Izquierdo – National Procurement Manager

Training:

Responsibility for the organisation's training activities and strategy is as follows:

- Stephanie Wessel - Head of People and Culture
- Andrew Murray – People Development Manager

Homes for Students utilise an internal e-learning platform call “Essential Skillz”.

We have a *Modern Slavery* course which is mandatory for all employees to be completed to a required pass mark on an annual basis as part of our continuous professional development focus for our teams.

OUR PROGRESS

KEY OBJECTIVES

- Define and publish our first Modern Slavery Statement for FY 2022
- Develop a robust Modern Slavery strategy to eliminate all forms of slavery from our business

RISK ASSESSMENT, PREVENTION AND MITIGATION

- Adopt a risk-based approach to evaluate and identify Modern Slavery and Human Trafficking risks within our supply chain

DUE DILIGENCE

- Adopt a new procedure for those suppliers within designated high-risk Modern Slavery supply chain categories to complete: *Supplier Self-Assessment Questionnaire (MSA)*
- Tracking of declaration responsibility with Juan Izquierdo, National Procurement Manager

TRAINING AND CAPACITY BUILDING

- Modern Slavery training made available to our team as part of our e-learning CPD syllabus

- Tracking of training completion responsibility with Andrew Murray, People Development Manager
- High risk category supplier engagements based on risk assessment, developing transparent and trusted relationships

The Board of Homes for Students Limited are committed to the identification and eradication of Modern Slavery and Human Trafficking in our operations and supply chains.

Graham Rogers, Group Executive Director, is named as the Board Level Director responsible for compliance with the Modern Slavery Act 2015.



Graham Rogers
Group Executive Director
March 2022