

Alternative Accommodation Agency Ltd

Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out (A3) The Alternative Accommodation Agency's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

As part of the Financial Sector the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of The Alternative Accommodation Agency.

- The Alternative Accommodation Agency (A3) Ltd was set up especially to provide relocation services to the Home Insurance and Home Building Industries and other related sectors.
- Where policyholders, homeowners or tenants who have suffered a flood, fire, subsidence or other such occurrence rendering their home uninhabitable require alternative accommodation, A3 can provide emergency hotel, short-term let and longer term rental accommodation together with other services whilst their own properties are refurbished.
- A3 engage the services of approved suppliers in their day-to-day activities; for serviced apartments, removals and storage services and furniture hire.

Countries of operation and Risk Assessment

A3 currently operates only in the UK and all of its business activities are carried out within the UK. The organisation is not aware of any evidence or potential evidence of any slavery or human trafficking within the past 12 months nor have there been any concerns raised which might point to any such evidence.

The organisation has therefore assessed the risk of slavery and human trafficking within its operational parameters in the UK as **LOW RISK**.

Risk Assessments will be carried out annually and any change in the level of risk will be reported to the Board of Directors for any necessary action to be taken.

Responsibility

Responsibility for the organisation's anti-slavery initiatives rests with the Board of Directors who have implemented the following initiatives:

- **Internal Policies:** To ensure that all internal policies comply with current legislation in this instance compliance with section 54(1) of the Modern Slavery Act 2015.
- **Risk assessments:** To engender a culture of regular Risk Assessment in every area of its business including responsibility for human rights and modern slavery risk analysis.
- **Investigations/due diligence:** Where Risk Assessments highlight or raise the possibility of any failure to comply with current legislation the Board of Directors are responsible for investigations and due diligence including in relation to known or suspected instances of slavery and human trafficking.
- **Training:** The Board of Directors are committed to an ongoing programme of training and staff awareness of legislation and other factors which impact their work to better understand and respond to any identified slavery and human trafficking risks.

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our confidential disclosure process.
- **Employees code of conduct** The organisation's internal Staff Handbook makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Recruitment policy** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Ethical Business Policy** The organisation is committed to the practice of responsible corporate behaviour and seeks to protect and promote the human rights and basic freedoms of all its employees and agents.
- **Ant-Bribery Policy** The organisation has a clear and transparent attitude towards bribery as set out in its anti-bribery policy.

Due Diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through its commitment to ISO 9001 and ISO 27001 which have a degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;
- using an ethical supplier database, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Training & Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- requiring all staff to undergo training on modern slavery;
- developing a system for supply chain verification whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- reviewing existing supply chains whereby the organisation evaluates all existing suppliers.

Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by issuing this statement and distributing flyers to staff.

The flyers explain to staff:

- the basic principles of the Modern Slavery Act 2015;

- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

Board approval

This policy has been approved & authorised by:

Name: Martin Oldroyd ñ Managing Director

Position: On behalf of the Board of Directors

Signature : *M Oldroyd*