

Bromford.

Human Trafficking and Modern Slavery Statement:

For the financial year 2020-2021 – ended 31 March 2021

Statement & Purpose

This statement is made for and on behalf of Bromford Housing Group Limited (Bromford) and its subsidiaries, to set out Bromford's actions to understand all potential modern slavery risks and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our organisation or its supply chains.

Bromford is incorporated as a Community Benefit Society with the Financial Conduct Authority (register number 29996). Bromford is a social housing provider that provides good quality, affordable housing to people whose needs are not met on the open market. We also provide additional support services to residents.

As a business, we're committed to upholding the highest standards of probity, openness and transparency so we can provide the best service to our customers, protect our assets and reputation and safeguard public funds.

We expect those we work with to have the same attitude and approach and we would never knowingly seek to work with any organisation whose approach or practices were found to be incompatible with our own.

Scope

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. The principles and terms within this document apply to Slavery and Human Trafficking measures within Bromford for the financial year starting 1 April 2020 and ending 31 March 2021.

This statement covers Bromford Housing Group and its Group Subsidiaries. The Group Subsidiaries include: Bromford Housing Association Limited, Merlin Housing Society Limited, Bromford Developments Limited, Bromford Home Ownership Limited, Oakbrook Homes Limited, Street Services Limited, Bromford Assured Homes Limited, Strand Services (Whitchurch) Limited, Riverside Mews Management Company Limited and any other subsidiary of Bromford or its group subsidiaries from time to time.

This statement is published on our Group Intranet and website.

Legislative Requirements

The Modern Slavery Act 2015 requires businesses (including Bromford) to produce a statement setting out the steps they have taken to ensure there is no modern slavery in their own business and their supply chains in each financial year.

Responsibilities

The **Board** has overall responsibility for approving this statement before publication.

Specific responsibilities for managing the following key risk areas have been delegated to the Executive as below:

People Services – Recruitment and conduct policies, compliance/awareness training of colleagues.

Localities – Safeguarding of vulnerable customers.

Procurement – Ensuring adherence to the Commercial and Procurement Policy, compliance of third party suppliers.

Governance, Risk and Assurance – Health and Safety and probity policies.

Our policies and procedures

Our policies reflect our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in our supply chains. We have a number of policies in place that contribute to ensuring modern slavery does not occur within our company, and we review these on a regular basis:

- Health and Safety
- Equality and Diversity
- Safeguarding
- Whistleblowing
- Recruitment
- Bullying and Harassment
- Conduct, Probity and Bribery
- Code of Conduct
- Commercial and Procurement Policy

We provide information to colleagues about the Modern Slavery Helpline on 0800 0121 700 via information on our intranet. We included this information in our safeguarding training. This will allow anyone who thinks they may have come across an instance of modern slavery to call for more information and guidance on what to do next.

In any case, where a colleague may be concerned about the welfare of a customer or member of the public, they should follow the safeguarding procedure and inform their line manager.

Identification of Risks, Mitigations and Due Diligence –

Risk Identification

We have identified the key areas of our activity where there is a risk that modern slavery and human trafficking might be detected. This includes activity that is taking place:

- In our supply chains
- In our homes
- Through our recruitment activities

Mitigations and Due Diligence

As part of our activity to identify and mitigate the risk of slavery and human trafficking, we have systems, processes and due diligence activity in place which:

- Mitigates the risk of slavery and human trafficking occurring in our supply chains;
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- Protects those living in our homes; and
 - Makes sure our colleagues know how to spot situations where Modern Slavery might be taking place

Procurement and our Supply Chains

We target reduction of human trafficking and modern slavery in our supply chain, by promoting the following activities and behaviours, which are:

- a) Challenging any abnormally low-cost tenders to ensure they do not rely upon the potential contractor(s) practising modern slavery
- b) Advocating training both in Bromford and in our supply chain to understand modern slavery through the Chartered Institute of Procurement and Supply (CIPS) online course on Ethical Procurement and Supply
- c) Sharing risks with our supply chain identified concerning modern slavery and refer them to the relevant agencies to be addressed
- d) Highlighting to our supply chain where relevant that contracted workers are free to join a trade union and are not to be treated unfairly for belonging to one

What expect our supplier to:

- a) Comply fully with the Modern Slavery Act 2015 wherever they trade with Bromford and through their supply chain.
- b) Adopt a whistle-blowing policy which enables their staff to blow the whistle on any suspected examples of modern slavery.

Construction work – Construction labour suppliers are particularly susceptible to modern slavery, and clearly form an integral part of our supply chain. Our supplier vetting procedures help Bromford to manage the risk of modern slavery taking place in our supply chain. Our development contracts include a clause requiring compliance with the Modern Slavery Act.

Colleague Recruitment – Our recruitment and people management procedures ensure that all prospective employees are legally entitled to work in the UK and that employees are safeguarded from any abuse or coercion once in our employment. Our people management practices include:

- pre-employment checks: work permits, DBS checks, references; and
- paying the living wage foundation rate.

Modern Slavery in our homes and Training

Criminals can commit modern slavery and trafficking from anywhere, and large housing providers may unsuspectingly enable it to take place. We are committed to ensuring that no modern slavery and human trafficking takes place from any of our homes or properties.

As an organisation active in the community, Bromford is well placed to identify signs of slavery and human trafficking, and as such, we provide ongoing safeguarding training, which includes information about modern slavery and trafficking, to the appropriate colleagues to help them spot issues or concerns when going into homes and meeting customers.

Future Action

During the financial year 2021-2022 Bromford intends to further expand the steps it takes to combat modern slavery and human trafficking.

- We will enhance the materials available to Colleagues to support them in identifying modern slavery in our supply chains and through the use of third parties for the provision of staff.
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- We will consider whether we can improve the monitoring of our procurement arrangements.
 - We will implement an app to assist recruiting managers with eligibility to work in the UK checks and identifying potentially fraudulent identity papers.
 - We will continue to ensure our Safeguarding Awareness training remains up to date and any refresher training required for front line workers particularly, and colleagues generally, is delivered at the appropriate time. All colleagues throughout Bromford have easy access to Safeguarding e-learning to support and embed learning.
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