

## Human Trafficking and Modern Slavery Statement Financial year 2022-23 (ended 31 March 2023)

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### Statement & Purpose

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

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### Scope

This statement applies to the financial year 1 April 2022 to 31 March 2023. It covers Bromford Housing Group and its Group Subsidiaries - Bromford Housing Association Limited, Merlin Housing Society Limited, Bromford Home Ownership Limited, Bromford Developments Limited, Oakbrook Homes Limited, Street Services Limited, Bromford Assured Homes Limited, Strand Services (Whitchurch) Limited, Riverside Mews Management Company Limited.

This statement is published on our Group Intranet and website.

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### Responsibilities

The Board has overall responsibility for approving this statement.

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

- People Services – Recruitment and conduct policies, and compliance/awareness training of colleague provided by Learning and Development;
  - Localities – Safeguarding of vulnerable customers;
  - Procurement – Ensuring adherence to the Procurement and Commercial Policy, and compliance of third-party suppliers; and
  - Risk – Health and Safety, Whistleblowing, Probity and Bribery policies.
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### Legislative or Regulatory Requirements

The Modern Slavery Act 2015 requires Bromford to produce an annual statement setting out the steps we have taken to ensure there is no modern slavery in our business and supply chains.

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## **WHAT WE ALREADY DO:**

### **Organisational structure**

Bromford Housing Group 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, Bromford is 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.

### **Organisational policies**

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 and human trafficking does not occur within Bromford, and we review these on a regular basis:

- Health and Safety Policy;
- Probity Policy;
- Procurement and Commercial Policy;
- Recruitment Policy;
- Safeguarding Policy; and
- Whistleblowing Policy.

### **Assessing and managing risk**

Bromford has identified areas where there is an increased risk of modern slavery and or human trafficking:

- During the recruitment and onboarding process of colleagues;
- Customers in their homes and others living in their homes; and
- Our supply chain and constructions activities.

### **Due diligence**

Bromford continues to undertake due diligence activities to identify, mitigate or remove the risk of modern slavery and human trafficking within our organisation, within our customer homes and in our supply chain.

We promote with colleagues and to those in our supply chain of our zero tolerance to human trafficking and modern slavery.

### **Requiring all suppliers and contractors to comply fully with the Modern Slavery Act 2015**

We require all contractor or suppliers we work with to be fully compliant with the Modern Slavery Act 2015.

If a contractor or supplier has been convicted of an offence relating to modern slavery (such as slavery, servitude, forced or compulsory labour, child labour, or an offence in human trafficking

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or any other form of trafficking in human beings) in the last 5 years then they are subject to mandatory exclusion at the prequalification stage.

Contractors may also be subject to discretionary exclusion based on non-compliance with Section 54 of the Modern Slavery Act which requires those with a turnover of more than £36M to publish a modern slavery statement.

Bromford's supplier contract further warrants they take appropriate steps to ensure there is no slavery or human trafficking in its supply chain and requires suppliers.

### **Challenging abnormally low-cost tenders**

We require procurement leads to challenge abnormally low-cost tenders and to exclude low-cost tenders where the contractor relies on exploitative labour to keep costs low.

### **Immediately referring any concerns for investigation**

If we identify any concerns that may indicate modern slavery and human trafficking may be taking place in our supply chains, we are committed to immediately reporting these concerns via the appropriate routes as detailed in our procedures. This includes ensuring the relevant referrals and safeguarding referrals and procedures are completed where concerns is raised.

In this past financial year (2022/23), no such concerns were identified within Bromford's supply chains.

However, we recognise that this does not mean our supply chains are necessarily free from exploitation, and we are committed to increasing awareness and upskilling colleagues to continuously risk assess and check for any signs of exploitation

### **Colleagues reporting concerns (whistleblowing)**

In any instance where there may be concerns around the possibility of colleagues being subjected to exploitative, unsafe, or unfair working conditions, we strongly encourage this to be reported immediately.

Bromford has a whistleblowing policy that encourages colleagues to raise any suspected misconduct, illegal acts, or failure to act within Bromford, without fear of recrimination.

Whistleblowers are protected and concerns raised through the whistleblowing policy are treated with the strictest confidence and will be thoroughly investigated. The whistleblowing policy is accessible on the colleagues on our intranet. The whistleblowing policy provides detail of the support services available, and how to access support.

### **Colleague recruitment and training**

During 2022/23 we moved to a specialist provider, Verifile, to undertake our digital verification of new colleagues joining Bromford and we undertake Disclosure Barring Service checks every three years, or where a colleague changes role.

Bromford is committed to providing a rewarding, fair, inclusive, and sustainable working environment for all colleagues. Bromford has adopted a range of policies accessible to all colleagues to ensure that this is achieved. These policies include:

- Health and safety;
- People at work; and
- Equality, diversity, and inclusion.

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All colleagues are provided with mandatory safeguarding and health and safety training as part of the induction process and on a cyclical basis.

**WHAT WE ARE GOING TO DO NEXT:**

In the next financial year (2023/24) we will:

- Create a Bromford wide working group to identify and mitigate modern slavery and human trafficking risks, and adopt good practice and measures from across sectors;
- Undertake a modern slavery and human trafficking risk assessment;
- Review our procurement templates and contractual wording to align with guidance provided by HM Government;
- Develop the pre-existing Safeguarding eLearning content and the Safeguarding framework;
- Provide modern slavery and human trafficking training specifically for leaders in our leadership academy and or leadership eLearning;
- Promote the tools and resources available to colleagues who may have concerns about potential exploitative practices taking place;
- Continue to consider new ways of ensuring our supply chains are free of modern slavery; and
- Report on our progress in next year’s annual modern slavery statement.

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**Document Details**

**Owner:** Sarah Beal, Company Secretary, Head of Governance  
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