

Slavery and Human Trafficking Statement

Policy Statement & Purpose

This statement is made for and on behalf of Bromford Housing Group Limited (Bromford) and all group subsidiaries with regards to the Modern Slavery Act 2015 which requires large employers (with a turnover of more than £36 million) to be transparent about their efforts to eradicate Slavery and Human Trafficking in their supply chain.

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.

In compliance with the Modern Slavery Act 2015, Bromford has a zero-tolerance approach to slavery, human trafficking, exploitation or corruption of any kind in the work we do, in the work our partners do and in our wider supply chain.

We expect those we work with to have the same zero-tolerance 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

The principles and terms within this document apply to Slavery and Human Trafficking measures within Bromford.

As of the 2nd July 2018, this policy replaces the 'Slavery and Human Trafficking Statement' from Bromford and the 'Modern Slavery Transparency Statement 2018' from Merlin Housing Society

This Policy covers Bromford Housing Group and its subsidiaries.

Reference Documents

This policy is published on our group intranet ('Mint/OurSpace') and on the Bromford website.

Additional guidance, related policies and procedures:

Bromford	Merlin
Probity Policy	Probity Policy
Openness and Transparency Policy	Grievance, disciplinary and whistleblowing procedures
Confidential Reporting Policy	Health and safety policies and procedures
Procurement Policy	Procurement Policy
Code of conduct framework Policy	Colleague code of conduct
Recruitment Policy and our Recruitment training for all leaders	
Due diligence process for TUPE	

Legislative Requirements

Bromford's policy is to comply with the Modern Slavery Act 2015 which 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.

- [Modern Slavery Act 2015](#)

Responsibilities

For queries about this Policy please contact the Chief Risk Officer.

The Board has overall responsibility for this policy.

Line Managers are responsible for engaging with their team to:

- Implement and maintain the processes and procedures
- Ensure that their people are aware of their responsibilities and receive appropriate training

All employees are responsible for:

- Carrying out their work in line with this policy and associated procedures
- Applying our values and behaviours in everything they do

Policy Principles

We are committed to ensuring that there is no modern slavery in our supply chains or in any part of our organisation. Our policies in relation to probity, procurement, code of conduct, whistle blowing, safeguarding and health & safety and recruitment, all 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.

Due diligence processes

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

- identify and assess potential risk areas in our supply chains;
- mitigate the risk of slavery and human trafficking occurring in our supply chains; and
- protect those who wish to raise concerns in confidence.

Our recruitment and people management procedures ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion once in our employment. They include

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

Supplier adherence to our values

We are committed to tackling modern slavery and human trafficking – we have a zero-tolerance approach and want to work with suppliers who share our values.

To make sure our contractors and all those in our supply chain are aware of, and comply with, our values, we use a number of approaches including:

- supplier self-certification;
- pre-qualification questions to determine suitability of potential suppliers; and
- standard clauses in conditions of contract that specifically require legal compliance by suppliers.

Training

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 to the appropriate colleagues to help them to spot issues when going into homes and meeting customers.

All colleagues are required to complete our Probity training module. The module includes sections on probity, openness and transparency and whistleblowing.

colleagues in the Procurement Team who are members of the Chartered Institute of Procurement & Supply (CIPS) are required to achieve an annual certification in 'Ethical procurement and supply' as accredited by CIPS.

We have made all colleagues aware of the Modern Slavery Helpline on 0800 0121 700. 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 you may be concerned about the welfare of a customer or member of the public you should also inform your line manager, following the safeguarding procedure.

UK Modern Slavery Adult Victim support providers:

- England and Wales The Salvation Army - 0300 303 8151
- UK Government Modern Slavery Helpline - 0800 0121 700

Risks

We have identified the following risk in relation to modern slavery and human trafficking:

- **Individual procurements above £100,000** – There is a greater risk of slavery and human trafficking entering our supply chains when we are working with larger suppliers/contractors or on higher-value contracts.
 - To address this risk, a risk analysis is undertaken on all contracts above £100,000. Risks are managed through supplier sourcing & selection and during contract management. We will end supply contracts where we find suppliers are non-compliant.
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Assurance Framework

This policy is published on the Mint / Our Space intranet sites and included within the Functional Directors Quarterly Assurance statement.

All staff are required to confirm they have read and understand this policy;

All staff will be required to complete appropriate training relating to this policy which will test understanding;

We will produce an annual compliance statement and have periodic independent reviews to confirm that we follow the policy principles and key controls.

This policy will be reviewed every three years or sooner if changes are made to organisational structure, responsibilities, assurance arrangements or due to changes in the external environment.

Document Details

Owner: Chief Risk Officer
Approved By: Board of Bromford Housing Group Limited
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