

Slavery and Human Trafficking Statement

This statement covering the period up to 31 March 2019 relates to The County Durham Housing Group whose functions were amalgamated in to believe housing from 1 April 2019

This statement is made to address the requirements of section 54 of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for each organisation that constitutes The County Durham Housing Group for the financial year ended 31st March 2019. Our turnover is £66.5m which exceeds the £36m threshold for this reporting.

Our structure and business

County Durham Housing Group comprises the parent and three subsidiaries up to 31 March 2019. All entities were charitable community benefit societies and registered providers of social housing whose principal activities were the provision of affordable rented accommodation.

We own and manage 17,994 properties and our business aims to: build a reputation as an outstanding landlord who invests in our people; deliver a modern and efficient customer service and build communities that are empowered to influence and shape local decision making.

Our policies relating to slavery and human trafficking

Our vision is “We believe in life without barriers” and operating our business to the highest moral and ethical standards helps support this vision. As such, we are committed to the principles of the Modern Slavery Act and recognise we have a responsibility to do our utmost to tackle modern slavery and human trafficking. We take a zero tolerance approach to human trafficking and slavery throughout our business.

Our safeguarding policy highlights that modern slavery is a form of abuse and must be dealt with as such. Our policy clearly sets out the roles and responsibilities for all staff across the organisation to deal with concerns or disclosures of abuse (including modern slavery). All staff were required to read this policy and specific staff training has been delivered to relevant teams across the organisation.

Our tenancy management policy sets out that regular tenancy visits are undertaken which aim to ensure that tenants are adhering to their tenancy agreement. This includes that the

legal tenant and their household are living in the property and that it is not being used for illegal purposes (for example modern slavery).

We employ over 450 staff and recognise the potential for slavery and human trafficking to affect employees across the business. We have robust HR policies and procedures in place to ensure employees are treated with dignity and respect and support our approach to equality and diversity. Our employee code of conduct which all staff must sign up to, requires compliance with all relevant legislation, which includes the Modern Slavery Act

We have a specific policy in relation to whistleblowing which, whilst not focussing specifically on modern slavery and human trafficking, sets out the process by which concerned employees and Board Members can report any concerns of wrongdoing involving the organisation or its staff.

Our supply chains

We procure a wide range of goods and services through a varied supply chain, including:

- Property related services and materials, including development of new homes
- Facilities management services
- IT and digital equipment
- Professional services
- Office services, equipment and supplies
- Utilities
- Housing management services and supplies

We work with a wide range of suppliers, some of whom subcontract work to other suppliers. Some of our suppliers also utilise recruitment agencies to supply temporary or permanent staff. We work closely with our suppliers to ensure they meet our minimum standards and comply with all local and national laws and regulations, including the Modern Slavery Act.

Due diligence processes for slavery and human trafficking

We require all potential new suppliers to complete an equality and diversity self-assessment to confirm their compliance with relevant national and international legislation.

We require all suppliers to match our commitment to equality and diversity in employment practices and service provision and this includes modern slavery and human trafficking.

We ask successful tenderers contracting with the organisation to ensure that they adhere to their obligations in respect of, amongst other things, equitable treatment of employees. Should suppliers not meet our standards, or refuse to work towards meeting our standards, then we may refuse to do business with them.

Areas of operation at risk of slavery and human trafficking

We are a UK based organisation with business activity taking place across the North East of England.

We believe that the risk of modern slavery or human trafficking impacting our business or supply chain is comparatively low. Despite this, we have highlighted that there are some areas of our operations that are more vulnerable to modern slavery than others, particularly in relation to suppliers and sub-contractors for maintenance, repairs and construction. Our contractual terms and conditions for suppliers and contracts make specific reference to safeguarding and the legal and ethical requirements in this area.

Effectiveness

Our policies and procedures will be monitored and any areas of concern will be addressed. We continue to remain vigilant to the risk of modern slavery and have processes and procedures in place that allow us to continue to monitor our operations.

Future plans

We are introducing the principles of category management across the organisation to enhance our procurement and contract management arrangements and make them more robust. Effective procurement and contract management is the main mitigation in addressing the risk of modern slavery and this will have a direct impact on our approach to the risk of modern slavery in our supply chain.

This statement was approved by the Board on 17 September 2019.

Judith Common, Chair of the Board