

Slavery and Human Trafficking Statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Believe Housing Limited (believe housing) for the financial year ended 31st March 2020. Our turnover is £66.1m which exceeds the £36m threshold for this reporting.

Our business

Believe housing is a charitable community benefit society and registered provider of social housing in operating across the North East of England.

We own and manage 18,076 properties and our business aims to:

- Improve the customer experience to be reliable, consistent and provide quality;
- Be an innovative and creative organisation, don't stand still;
- Create thriving places and homes people want to live in;
- Build our relationship with our customers;
- Be a sound, secure organisation ready to take opportunities;
- Collaborate with others and sharing our success;
- Invest in and celebrate our people; and
- Protect and respect our environment.

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).

Our tenancy management policy sets out that regular tenancy visits are undertaken which aim to ensure that our customers 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 human trafficking or modern slavery).

All existing and new commercial leases contain a covenant requiring the tenant to adhere to lawful use of the property. Whilst visiting or inspecting the property and/or corresponding with the tenants, if any unlawful business or activity (including human trafficking or modern slavery) is suspected, we will notify the Police. Unlawful activity can result in leases being terminated.

We employ over 500 staff and recognise the potential for slavery and human trafficking to affect employees across the business. We have robust 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 staff

The role of our staff in meeting our responsibilities in respect of modern slavery is vital and to ensure they are equipped with the right skills and knowledge to understand their role all staff were required to follow our safeguarding policy. Specific training has been provided to teams across the organisation who interact directly with our customers and suppliers.

This training ensures that they are equipped to identify potential signs of modern slavery when they are interacting with our residents and suppliers and understand the steps they need to take where they have any concerns.

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. This includes

ongoing monitoring of our suppliers and contractors to confirm their compliance with legal requirements, including the requirements associated with modern slavery.

Future plans

Following a successful pilot of category management principles we are rolling out these new processes across the business to make our procurement and contract management arrangements 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 has been approved by the Board on 13 July 2020.

A handwritten signature in black ink, appearing to read 'AS', with a horizontal line extending to the right.

Alan Smith, Executive Director of Investment, Growth and Performance