

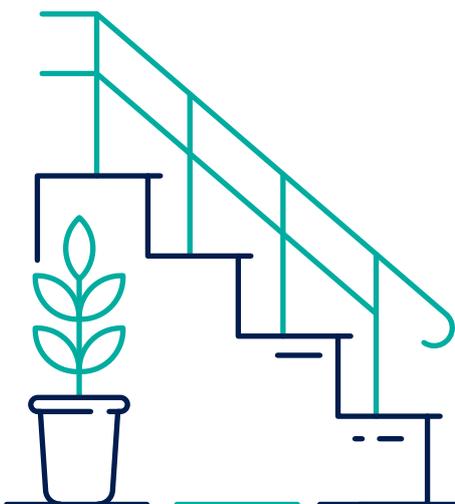
# slavery and human trafficking statement

June 2021

**believe**  
housing

# contents

Section No.	Title	Page No.
1	Slavery and human trafficking statement	3
2	Our business	3
3	Our policies relating to slavery and human trafficking	4
4	Our commercial properties	5
5	Our supply chains	5
6	Due diligence processes for slavery and human trafficking	6
7	Areas of operation at risk of slavery and human trafficking	6
8	Effectiveness	6



## section 1

# slavery and human trafficking statement

- 1.1. 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 31 March 2021. Our turnover is £67.6m which exceeds the £36m threshold for this reporting.

## section 2

# our business

- 1.1. 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 over 18,000 properties and employ over 540 people. Our values are:

### Do the right thing

- **For our people**
- **For our customers**
- **For our business**

During 2020/21 our overarching objectives were as follows:

### our people

Innovative and creative organisation - don't stand still

Collaborating with others and recognising our success

Invest in and celebrate our people

### our customer

Deliver a great customer experience - consistent, reliable, quality, taking responsibility

Building our relationship with customers

Creating thriving places and homes people want to live in

### our business

Respecting and protecting our planet

Being a sound and secure business ready to take opportunities

## section 3

# our policies relating to slavery and human trafficking

- 3.1. 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 are required to read this policy and there is a training programme in place for all relevant teams across the organisation. We have a number of safeguarding leads across the business to support staff and ensure that the correct procedures are followed. We have also appointed a Safeguarding Coordinator to help support the safeguarding leads in their role and coordinate our safeguarding efforts across the business.

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 540 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.

## section 4

# our commercial properties

- 4.1. We have a small number of commercial units in our housing estates which are let to businesses. Our commercial tenancy agreements include a covenant that the tenant must adhere to lawful use of the property. This is monitored through annual inspections of the properties and if any unlawful business (including human trafficking or slavery) is suspected, the police are notified. Where any suspicions of illegal activity are proven the necessary legal steps would be taken to terminate the lease.

In addition, our Commercial Property Team have all recently undergone safeguarding training.

## section 5

# our supply chains

- 5.1. 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

During 2020/21 we have put in place new category management processes and procedures which have strengthened our procurement and contract management arrangements. This is the main mitigation in addressing modern slavery in our supply chain.

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.

## section 6

# due diligence processes for slavery and human trafficking

- 6.1. 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.

## section 7

# areas of operation at risk of slavery and human trafficking

- 7.1. We are a UK based organisation with all of our 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.

## section 8

# effectiveness

- 8.1. 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 statement has been approved by the Board on 19 May 2021.

