

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 31 March 2022. Our annual turnover 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 over 18,000 properties and employ over 540 people. At believe housing we agree that our core values are simple. We all agree to...

Do the right thing:

For our people

For our customers

For our business

The 2021 update to our three year Corporate Plan confirmed the following overarching objectives:

people experience

Innovative and creative organisation - don't stand still
Create meaningful collaborations with others and recognise our success
Developing a culture we are proud of and recognised for – attracting and retaining the best people

customer experience

Deliver a great customer experience - easy to deal with
Continually developing our relationship with customers – supporting you when you need it
Creating thriving places and homes people want to live in

business experience

Being a sound and secure business ready to take opportunities
Respecting and protecting our planet
Embracing equality, diversity and inclusion

Our policies relating to slavery and human trafficking

“We believe in life without barriers” is our vision and to achieve this we operate our business to the highest moral and ethical standards.

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 also have a Safeguarding Coordinator who supports the safeguarding leads and coordinates 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, diversity and inclusion. 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 commercial properties

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.

Our Commercial Property Team have all received safeguarding training.

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

Our central procurement team supports the business, using category management processes and procedures to provide a robust framework for both procurement activities and contract management arrangements. Our category managers work closely with their assigned parts of the business ensure appropriate contracts are in place for the provision of required goods and services and that contracts are managed to ensure required performance is delivered. 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 are aware that we expect them to 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, diversity and inclusion self-assessment to confirm their compliance with relevant national and international legislation. We require all suppliers to match our commitment to equality, diversity and inclusion in

employment practices and service provision and this includes modern slavery and human trafficking.

We ask suppliers 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 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 relatively low, however we recognise that current economic and social factors mean that this risk is heightened and therefore it is vital we remain vigilant. 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 works and the renting of our commercial properties. 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 statement has been approved by the Board on 18th May 2022.

Alan Smith, Executive Director of Investment, Growth and Performance