



## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT - 2021**

### **Who we are**

Shepherds Bush Housing Group is committed to ensuring that there is no modern slavery or human trafficking in any part of our business or our supply chains. We are committed to acting ethically and with integrity in all our business relationships and enforcing effective processes and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Shepherds Bush Housing Group (SBHG) is diverse. We are a registered Housing Association and are regulated by the Regulator of Social Housing (RSH).

We are much more than a landlord, we incorporate traditional housing provision, support services for the vulnerable and a repairs and maintenance service.

We work in the West London Boroughs including Hounslow, Ealing, Richmond, Brent, Hillingdon, Kensington & Chelsea, and Harrow. However, most of our stock is in the London Borough of Hammersmith & Fulham.

### **Statement of Intent**

Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men using force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation.

SBHG are committed to being compliant with the Modern Slavery Act 2015, which gives law enforcement the tools to fight modern slavery, ensure perpetrators can receive suitably severe punishments for these appalling crimes and enhance support and protection for victims.

We are committed to reviewing this statement annually and reviewing any measurables that are outlined in the statement.

### **Our Supply Chain**

Details of the Group's supply chain can be requested from the Contracts and Procurement Manager via [customer.service@sbhg.co.uk](mailto:customer.service@sbhg.co.uk).

Our procurement team adhere to all relevant Procurement policies and legislation. As a result, we can fully consider quality, price, and purpose prior to making buying decisions. We have contract managers in place for every supplier we use, which enables us to achieve and maintain the highest standards possible. We only use specified, reputable employment agencies to source labour. This statement extends to all our suppliers as well as their subcontractors.

Currently, we follow the EU Procurement Directives as good practice as well as to ensure that any safeguarding incidents raised by our suppliers are acted on as necessary.

All our contractors and suppliers are UK based, and we are committed to using local firms wherever possible, which allows us to develop close working relationships. This also links in to our commitment

to social value and responsibility, living wage, sustainable procurement, a priority on supporting the local economy, and in working collaboratively with our suppliers (and their suppliers) to phase out, and, ultimately, put a stop to all forms of slavery and human trafficking.

The % of compliant suppliers is reported to Group Board annually.

### **Our Residents & Properties**

We understand that our customer base is representative of a diverse set of backgrounds and needs, and that isolated customers or individuals with vulnerabilities may be especially at risk. We will, therefore, carry out all processes to help us identify any at risk or vulnerable residents or groups in our properties.

We carry out tenancy audits, (including ID checks) on an annual basis, and ensure that there all appropriate processes are in place to make sure that homes are allocated appropriately. We will also ensure that all our front-line staff who visit customers' homes have completed the appropriate safeguarding training and understand fully how to raise/report any safeguarding concerns they may have. We will ensure that we utilize our partnerships with external organisations to share intelligence, which will better our ability to identify where Modern Slavery could potentially be taking place.

We recognise that the use of our homes to facilitate Modern Slavery is a risk, and so, any suspected cases of tenancy fraud will be reported to our Finance, Risk and Audit committee quarterly. Likewise, any tenancy found to have been granted on a fraudulent application will be terminated through the appropriate mechanisms.

As part of the annual report to Group Board we will confirm how many tenancy audits have been completed against the target and by exception how many safeguarding issues were raised.

### **Our Staff**

We believe that everyone has a crucial part to play in tackling Modern Slavery and Human Trafficking, and we will continue to do all we can to raise awareness so that staff are able to understand, identify and report on any potential risks.

We ensure that all relevant processes to ensure compliance with UK employment law are drawn upon at all times. This includes a commitment towards meeting salaries in accordance with the Living Wage Foundation, and the National Living Wage for apprentices.

All our staff-based policies and procedures comply with UK employment law and work to mitigate the risks posed by Modern Slavery and Human Trafficking as follows:

- All new employees go through robust vetting procedures and ID confirmation
- Any temporary staff are sourced through reputable agencies and under the supervision of the HR team
- All staff must complete mandatory training in the form of e-learning, and we monitor and report on the total percentage of staff who do so
- The correct posts are in place for us to ensure the effective management of the risks associated with Modern Slavery – namely, Procurement Manager, HR Manager and CFO. The Head of Governance & Risk will take the lead responsibility for the development and implementation of the Group's anti-slavery initiatives.

### **Relevant Policies**

We operate the following policies:

Employee Charter - We strive to maintain the highest standards of employee conduct and ethical behaviour in delivering our services and managing our supply chain. The Employee Charter sets out the behaviours expected of our employees when representing Shepherds Bush Housing Group.

Procurement Policy - SBHG is committed to ensuring that its suppliers adhere to the highest standards of ethics as part of the procurement process. Suppliers are required to demonstrate that they provide safe working conditions, treat employees with dignity and respect and comply with relevant employment legislation.

Recruitment - SBHG will undertake all relevant pre-employment checks prior to staff being employed. We will carry out fair and transparent recruitment processes and will ensure our recruitment agencies comply with these requirements in the provision of agency staff.

Whistleblowing Policy - SBHG is committed to the highest standards of quality, probity, openness and accountability and as part of this commitment provides a confidential reporting process for employees to report serious concerns about any aspect of our work which includes abuse or neglect of vulnerable people.

### **Due Diligence**

We will ensure that there are ongoing training opportunities so that all staff recognise the importance of The Modern Slavery Act 2015, and where this sits in comparison to other relevant policies within the field, such as whistleblowing and recruitment, so that we remain fully compliant at all times.

Going forward SBHG will implement the following actions to mitigate the risk of slavery or human trafficking in the delivery of its services and supply chain:

- All existing suppliers will be asked to provide evidence of compliance with the principles of the Modern Slavery Act. Organisations with a turnover of more than £36 million will be required to provide a copy of their Slavery and Human Trafficking Statement
- The tendering of new contracts will include an obligation that suppliers comply with the Modern Slavery Act
- To ensure an understanding of the potential risks of modern slavery and human trafficking in delivering our services and managing our supply chain, we will provide training to relevant members of staff.
- Where appropriate we will include reference to the Modern Slavery Act 2015 in our policies and procedures.

This statement has been approved by the Board of Shepherds Bush Housing Association, who will review and update it annually.