

# Bromford.

## Modern Slavery Statement 2019-20

### Policy Statement & Purpose

This statement is made for and on behalf of Bromford Housing Group Limited (Bromford) and its wider group. Bromford is incorporated as a community benefit society with the Financial Conduct Authority (register number 29996).

Bromford is a social housing provider that provides good quality, affordable housing to people whose needs are not met on the open market. We also provide additional support services to residents.

The Group has a global annual turnover of in excess of £36 million.

As a business, we're committed to upholding the highest standards of probity, openness and transparency so we can provide the best service to our customers, protect our assets and reputation and safeguard public funds.

In compliance with the Modern Slavery Act 2015, Bromford has a zero-tolerance approach to slavery, human trafficking, exploitation or corruption of any kind in the work we do, in the work our partners do and in our wider supply chain.

We expect those we work with to have the same zero-tolerance attitude and approach and we would never knowingly seek to work with any organisation whose approach or practices were found to be incompatible with our own.

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### Scope

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. The principles and terms within this document apply to Slavery and Human Trafficking measures within Bromford for the financial year starting 1 April 2019 and ending 31 March 2020.

This Policy covers Bromford Housing Group and its Group Subsidiaries. The Group Subsidiaries include: Bromford Housing Association Limited, Merlin Housing Society Limited, Bromford Developments Limited, Bromford Home Ownership Limited, Oakbrook Homes Limited, Street Services Limited, Bromford Assured Homes Limited, Strand Services (Whitchurch) Limited, Riverside Mews Management Company Limited and any other subsidiary of Bromford or its group subsidiaries from time to time.

This policy is published on our Group Intranet and websites.

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### Legislative Requirements

Bromford's policy is to comply with the Modern Slavery Act 2015 which requires businesses (including Bromford) to produce a statement setting out the steps they have taken to ensure there is no modern slavery in their own business and their supply chains in each financial year

- [Modern Slavery Act 2015](#)

## Responsibilities

**The Board** has overall responsibility for this policy.

### **Line Managers are responsible for:**

Engaging with their team to:

- Implement and maintain the processes and procedures; and
- Ensure that their people are aware of their responsibilities and receive appropriate training.

### **All employees are responsible for:**

- Carrying out their work in line with this policy and associated procedures; and
  - Applying our values and behaviours in everything they do.
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## Policy Principles

We are committed to ensuring that there is no modern slavery in our supply chains or in any part of our organisation. Our policies in relation to probity, procurement, code of conduct, whistle blowing, safeguarding and health & safety and recruitment, all reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in our supply chains.

### **Identification of risks and mitigations**

As part of our initiative to identify and mitigate the risk of slavery and human trafficking, we have in place systems and processes which:

- Identify, assess and monitor potential risk areas in our supply chains;
- mitigate the risk of slavery and human trafficking occurring in our supply chains; and
- protect those who wish to raise concerns in confidence.

### **Supply Chains - Supplier adherence to our values – measuring and certifying our effectiveness**

We are committed to tackling modern slavery and human trafficking – we have a zero-tolerance approach and want to work with suppliers who share our values.

To make sure our contractors and all those in our supply chain are aware of, and comply with, our values, we use a number of approaches including:

- supplier self-certification;
- pre-qualification questions to determine suitability of potential suppliers; and
- standard clauses in conditions of contract that specifically require legal compliance by suppliers.

Colleagues in the Procurement Team who are members of the Chartered Institute of Procurement & Supply (CIPS) are required to achieve an annual certification in 'Ethical procurement and supply' as accredited by CIPS.

### **Colleague Recruitment**

Our recruitment and people management procedures ensure that all prospective employees are legally entitled to work in the UK and that employees are safeguarded from any abuse or coercion once in our employment. This commitment applies whether recruitment is directly by Bromford or through the use of agents. Our people management practices include:

- pre-employment checks: work permits, DBS, references; and
- paying the living wage foundation rate.

## Training

As an organisation active in the community, Bromford is well placed to identify signs of slavery and human trafficking, and as such, we provide ongoing safeguarding training to the appropriate colleagues to help them to spot issues when going into homes and meeting customers.

We have made all colleagues aware of the Modern Slavery Helpline on 0800 0121 700. This will allow anyone who thinks they may have come across an instance of modern slavery to call for more information and guidance on what to do next. In any case, where you may be concerned about the welfare of a customer or member of the public you should also inform your line manager, following the safeguarding procedure.

UK Modern Slavery Adult Victim support providers:

- The Salvation Army (England and Wales) - 0300 303 8151
- UK Government Modern Slavery Helpline - 0800 0121 700

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## Risks

We have identified the following risks to Bromford in relation to modern slavery and human trafficking:

- **Individual procurements above £100,000** – There is a greater risk of slavery and human trafficking entering our supply chains when we are working with larger suppliers/contractors or on higher-value contracts.
  - To address this risk, a risk analysis is undertaken on all contracts above £100,000. Risks are managed through supplier sourcing and selection and during contract management. We will end supply contracts where we find suppliers are non-compliant.
- **Construction work** – Construction labour suppliers are particularly susceptible to modern slavery, and clearly form an integral part of our supply chain.
  - Our supplier vetting procedures help Bromford to manage the risk of modern slavery taking place in our supply chain.
- **Slavery and trafficking within our accommodation** – Criminals can commit modern slavery and trafficking from anywhere, and large housing providers may unsuspectingly enable it to take place. We are committed to ensuring that no modern slavery and human trafficking takes place from any of our homes or properties.

## Future Action

During this financial year Bromford intends to further expand the steps it takes to combat modern slavery and human trafficking in response to any new obligations required following the Government's consultation.

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Date of Board Approval: 24 September 2019

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