

Human Trafficking and Modern Slavery Statement

Financial Year 2023-24 (ended 31 March 2024)

Statement & purpose

This statement is provided to set out Bromford's actions to understand all potential modern slavery and human slavery risks, and to put in place steps that are aimed at ensuring that there is no modern slavery or human trafficking in our organisation or our supply chain.

This statement includes Bromford's approach to comprehend the risks associated with modern slavery and human trafficking, and to implement activities designed to guarantee the absence of such practices in both our operations and supply chain.

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Scope

The statement is made pursuant to section 54 of the Modern Slavery Act 2015. It covers the financial year starting from 1 April 2023 to 31 March 2024. The scope includes Bromford Housing Group and its Group Subsidiaries. This statement is published on our Group Intranet and website.

Responsibilities

The Board approves this statement before publication.

Specific responsibilities for the evaluation of modern slavery and human trafficking activities are delegated across key risk areas, including recruitment, safeguarding, procurement, and health and safety.

Legislative or regulatory requirements

The Modern Slavery Act 2015 mandates businesses to produce a statement detailing steps taken to prevent modern slavery within their organisation and supply chains.

Organisational structure

Bromford Housing Group 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.

Bromford maintains the utmost levels of integrity, transparency, and openness to our customers, secure our assets and reputation, and ensure the protection of funds.

We only seek to work with third parties who reflect our ethical stance and practices, and consciously avoid alliances with any entities whose methods or policies do not align with our standards.

Organisational policies

Our policies 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.

We have policies in place that contribute to ensuring modern slavery and human trafficking does not occur within Bromford, and we review these on a regular basis:

- Health and Safety Policy;
- Anti-Bribery and Corruption Policy;
- Probity Policy;
- Procurement and Commercial Policy;
- Recruitment Policy;
- Safeguarding Policy; and
- Whistleblowing Policy.

Assessing and managing risk

In the 2022/23 Human Trafficking and Modern Slavery Statement Bromford committed to the following:

- *Create a Bromford wide working group to identify and mitigate modern slavery and human trafficking risks and adopt good practice and measures from across sectors.*

A working group was set up in 2023 consisting of colleagues from directorates across Bromford. The group meets regularly to discuss areas of risk, actions to improve awareness, reporting of concerns and to reduce the potential of modern slavery and human trafficking.

- *Undertake a modern slavery and human trafficking risk assessment.*

A detailed risk assessment was undertaken with colleagues from the working group and others in potentially higher risk areas, this included governance, construction, investment, people team and procurement. The risk assessment has identified a number of initiatives Bromford will commit to in 2024/25, examples of these are stipulated in the next steps section of this statement.

- *Review our procurement templates and contractual wording to align with guidance provided by HM Government.*

Bromford undertook a comprehensive review of the procurement function in 2023/24. The outcomes of the review when implemented in 2024/25 will include the contractual wording provided by HM Government and in accordance with the Procurement Act 2023.

- *Develop the pre-existing safeguarding eLearning content and the safeguarding framework and provide modern slavery and human trafficking training specifically for leaders in our leadership academy and or leadership eLearning.*

The safeguarding eLearning content was revised to include specific reference to modern slavery and human trafficking. The eLearning content is now mandatory for colleagues and agency workers. The safeguarding framework was subject to scrutiny and review in 2023/24

which included improved reference to modern slavery and human trafficking with improvement actions aligned to increasing the knowledge and awareness of modern slavery and human trafficking. The leadership self-assessment, which is mandatory for all senior leaders in Bromford now explicitly references modern slavery and human trafficking.

- *Promote the tools and resources available to colleagues who may have concerns about potential exploitative practices taking place.*

Concern cards are completed by colleagues visiting customers in their homes. During 2024/25 the concern card will include specific reference to modern slavery and human trafficking. Bromford also reviewed the 'Unseen' app which provides a simple guide to recognising the signs of modern slavery and human trafficking, and reporting concerns in confidence. The app also includes a guide to types of modern slavery, an outline of key legislation, and an explanation of how to contact the modern slavery and exploitation helpline in 27 languages.

Subject to approval the 'Unseen' app will be promoted to colleagues to install on electronic devices in 2024/25.

- *Continue to consider new ways of ensuring our supply chains are free of modern slavery.*

The working group reviewed the pre-start meeting content Bromford has with construction contractors and identified improvements specifically in relation to the provision of and verification of contractors' modern slavery and human trafficking statements and risk assessments where applicable. The people team undertook a compliance review, and all agencies provided their modern slavery and human trafficking statements. Contractors will be provided copies of the Bromford whistleblowing policy to promote reporting of modern slavery and human trafficking concerns. We require all contractor or suppliers we work with to be fully compliant with the Modern Slavery Act 2015.

If a contractor or supplier has been convicted of an offence relating to modern slavery (such as slavery, servitude, forced or compulsory labour, child labour, or an offence in human trafficking or any other form of trafficking in human beings) in the last 5 years then they are subject to mandatory exclusion at the prequalification stage.

Contractors may also be subject to discretionary exclusion based on non-compliance with Section 54 of the Modern Slavery Act which requires those with a turnover of more than £36M to publish a modern slavery statement.

If we identify any concerns that may indicate modern slavery and human trafficking may be taking place in our supply chains, we are committed to immediately reporting these concerns via the appropriate routes as detailed in our procedures. This includes ensuring the relevant referrals and safeguarding referrals and procedures are completed where concerns are raised.

Reported concerns

In this past financial year (2023 to 2024), no such concerns were identified within Bromford's supply chains.

However, we recognise that this does not mean our supply chains are necessarily free from exploitation, and we are committed to increasing awareness and upskilling colleagues to continuously risk assess and check for any signs of exploitation.

Next steps

In the next financial year (2024 to 2025) we will:

- Implement a modern slavery and human trafficking policy and procedure.
- Identify key performance indicators to be monitored by the Board.
- Introduce a mid-year update to the Board of progress.
- Explore the inclusion of modern slavery and human trafficking on our risk register.
- Increase awareness and knowledge of modern slavery and human trafficking with colleagues and third parties.
- Evaluate 'reverse procurement' procedures where we are the contractor bidding for contracts in respect of modern slavery and modern slavery risk.
- Report on our progress in next year's annual modern slavery statement.

Useful external resources

Independent Anti-Slavery Commissioner: www.antislaverycommissioner.co.uk

Stop the Traffik: www.stophetraffik.org

Anti-Slavery: www.antislavery.org

Human Trafficking Foundation: www.humantraffickingfoundation.org

Unseen: www.unseenuk.org

Every Child Protected Against Trafficking: www.ecpat.org.uk

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