

Yorkshire Housing Limited

Modern Slavery and Human Trafficking Statement

Introduction

The Modern Slavery Act 2015 ('the Act') seeks to prevent the exploitation of workers and to stop human trafficking.

At Yorkshire Housing we do not tolerate any form of exploitation and we are committed to preventing modern slavery and human trafficking in our business and our supply chains, including taking steps to ensure that companies operating within our supply chains comply with the principles in the Act.

As a registered provider of social housing we operate with a strong sense of social purpose and ethical responsibility. Our work is focused on supporting the welfare of our customers, including those who are vulnerable or require additional support to live independently. We also have a strategic aim to be an Employer of Choice for all colleagues who choose to work with us.

This statement sets out the steps Yorkshire Housing has taken to address slavery and human trafficking during the financial year 1st April 2019 to 31st March 2020.

Structure of Yorkshire Housing

Yorkshire Housing employs approximately 620 people and provides housing related services to more than 18,000 homes across the Yorkshire region. Our business activity is entirely UK based.

The majority of our services relate to homes we own and rent within the region. We also operate a facilities management service to homes on the Swarcliffe estate in Leeds under a PFI contract, provide housing with independent living support services and carry out Home Improvement Agency work.

Policies, Training and Awareness

Our People (HR) policies operate in line with the principles of the Act and help to prevent cases of modern slavery throughout our business. Our policies are clear that no form of slavery or exploitation will be tolerated and are reviewed frequently to ensure they remain up to date.

The specific policies and procedures that address our approach to addressing modern slavery and human trafficking are set out below:

Safeguarding

We recognise that identifying and preventing slavery and human trafficking is mainly an issue of human welfare. Our Safeguarding Policy sets out clear procedures to identify, report and refer cases to the appropriate authorities

where appropriate and any colleague may report concerns about modern slavery using our internal safeguarding reporting system.

To support this, safeguarding training for all colleagues is mandatory to ensure that everyone who works for Yorkshire Housing has good awareness of situations which suggest vulnerable people may be being exploited. This training includes spotting the signs of potential exploitation of our customers. The principles included in our training can be equally applied to the exploitation of colleagues or other people we work with.

A Safeguarding Lead is in post to provide specialist support and advice to the business where required, and Safeguarding representatives are appointed within each business area. Further specialist training is provided to these employees in addition to the core programme.

Whistleblowing

We support anyone working directly for us or indirectly within our supply chain to raise concerns, in confidence, about any criminal offences including modern slavery or human trafficking.

Our Whistleblowing Policy and Procedure is well established and is designed to make it easy for anyone to make a disclosure without fear of retaliation.

Code of Conduct

Our Code makes clear to all colleagues the behaviour that is expected from them when representing our organisation. We strive to maintain the highest standards of conduct and ethics in all aspects of our work.

To further raise awareness of Modern Slavery and the role staff and tenants can play in identifying and preventing it, we have developed a communications strategy. This centres around anti-slavery day but operates throughout the year.

In addition to the above, all prospective tenants must provide evidence of their eligibility to remain in the UK before they are offered a home, which is stipulated within our vetting procedures. This is a measure used to help ensure our tenants have not been subject to illegal trafficking.

We also engage with third party specialist providers and our network of housing sector and local authority partners to identify up to date advice and guidance, sourcing training from subject experts where this is available.

Procurement and Supply Chains

We are committed to ensuring that our suppliers adhere to the highest standards of ethics and ensure that our contracts make it clear that serious violations of our policies will result in termination of the business relationship

Our suppliers are required to comply with the Act, to follow our policies and where applicable, to understand the needs of the vulnerable people we work with.

The supply chains of some parts of our business are complicated. Each area of our business has explicit responsibility to comply with our Procurement policy and procedures and to regularly review its supply chain to identify areas of risk of modern slavery and human trafficking.

To further secure our procurement processes, we have we have introduced, in July 2020 a new two stage Supplier Registration process and Supplier Assessment Form. Stage 1 is for colleagues to complete to be approved by a Head of Service. For stage 2 all suppliers and contractors, regardless of value and provision of service, are required to complete Supplier Assessment Form which meets the standards of the Standard Selection Questionnaire.

The Supplier Assessment Form asks whether suppliers are defined by section 54 of the Act and if so questions compliance with the annual reporting requirements. The form also asks suppliers to demonstrate that their workforce is free from exploitation and where turnover is above £36m provide a copy of their Modern Slavery Statement. The form is reviewed by Finance using an Evaluation Matrix which then requires approval by the Procurement Service and Head of Service.

Yorkshire Housing ensure all formal tendering activities are in accordance with legislative and ethical requirements. This considers Modern Slavery to ensure that to the best of our knowledge the companies we procure from are responsible and paying the living wage, as required, have not breached and comply YH policies under the Modern Slavery Act 2015.

Wherever possible we buy from suppliers via framework agreements such as Crown Commercial Service (CCS) who have a government wide strategy to tackle this issue. <https://www.crowncommercial.gov.uk/news/tackling-modern-slavery-what-ccs-is-doing>

Where that is not possible, suppliers will demonstrate their compliance via the Supplier Assessment Form detailed above (paragraph 5 for this section).

Beyond that our formal contracts do have a right to audit, although we have not exercised this. In practice that would mean a physical inspection of offices and records, if we suspected a breach of the legislation.

Whilst they are not infallible, we believe the above checks are proportionate to both our legal and moral compass in endeavours to avoid procuring from any supplier in breach of the Act.

We manage a framework of contractors who must sign up to Yorkshire Housing's policies to work on our behalf. All new contractors are required to confirm they comply with our policies and the Act. Anyone bidding for work must confirm that they comply with the Act before submitting a bid. An annual review

of all framework contractors takes place to ensure that supporting documentation is up to date and relevant. These confirmations give us some confidence in our supply chain, but it is recognised that this does not completely mitigate the risk, especially of long supply chains where we have no right to audit.

Our business uses agency workers for some activities. We have a managed service provider for agency workers who manage the supply of workers to us. This provider has issued a statement of how they prevent slavery and human trafficking when sourcing temporary staff. We believe this reduces the possibility of trafficked workers being used within Yorkshire Housing. We currently use three other agencies to provide highly skilled contractors. These contractors have been assessed as representing a lower level of risk.

We have identified construction as a sector which represents a higher risk, especially with our development programme. We identified that our Site Inspectors were most likely to identify Safeguarding concerns on site. During the year we have updated the documentation, used to carry out site inspections, to include a field to prompt consideration of any Safeguarding issues and includes the YH Safeguarding reporting process.

Employees and other workers

We treat all our colleagues fairly and have robust measure in place to ensure this, including:

- Robust recruitment processes including verifying people's identity and their right to work in the UK before starting work with us.
- Monitoring rates of pay and the calculation of the legal deduction of wages,
- Paying at least the national Living Wage and providing a range of core organisational benefits.
- Offering a free 24-hour employee assistance programme to all colleagues and their immediate household that provides advice and counselling, including legal advice.
- Ensuring that colleagues take frequent breaks and are not encouraged to work in excess of the number of working hours permitted by law.
- Making salary payments directly to employees and not delaying or withholding payments without prior notification and in line with our policy.


Effectiveness

We are continually improving our processes and reviewing our approach to modern slavery and human trafficking. A working group, led by the Interim Governance Manager is in place to discuss, agree and undertake actions to enhance our processes to further mitigate the risks and ensure awareness throughout our organisation.

Approval

This statement covers the full financial year 1st April 2019 to 31st March 2020

It was approved at the Yorkshire Housing Limited Board meeting on 16th September 2020.

Signed 

Will Lifford, Chair of the YHL Board

Date: 16th September 2020