

# **Slavery and human trafficking statement**

## **Introduction**

This statement is made in accordance with Part 6 Section 54 (1) of the Modern Slavery Act 2015 and constitutes South Yorkshire Housing Associations' (SYHA) slavery and human trafficking statement for the financial year April 2020 to March 2021.

SYHA operates a zero-tolerance policy towards slavery and human trafficking and is committed to ensuring it doesn't occur in our supply chains or in any part of our business. This statement has the support and approval of our Board. Managers and staff are expected to report any evidence that slavery and human trafficking is taking place.

## **Organisational structure**

SYHA is a charitable housing association registered society under the Co-operative and community benefit Societies Act 2014. It owns and manages around 6,000 properties and provides a range of care and supported housing services. It has two active subsidiaries - another provider of social housing, and an estate agency.

## **Our supply chains / due diligence**

SYHA operates entirely in the UK, and almost exclusively in highly regulated sectors. Many of its contracts are with public sector organisations. Other than in very rare circumstances, it sources all of its goods and services from UK based suppliers.

We have policies in place which help mitigate the risk of slavery and human trafficking within our business:

- Safeguarding Adults Policy
- Safeguarding Children and Young People Policy
- Whistleblowing Policy
- Equality & Diversity
- Anti-bribery Policy
- Recruitment Policy
- Probity Policy

To mitigate the risk existing in our supply chain generally, we have an approved procurement policy, which abides by the Public Contracts regulations 2015 and includes the following:

- Spend over a certain threshold is subject to selection and award criteria which reflect our organisational ethos in the policy areas mentioned above
- Suppliers who tender for our services are required to inform us if their organisation or their sub-contractors have had a complaint upheld following an investigation by the Equality and Human Rights Commission

We have assessed the nature of our activities and supply chain and consider risk generally to be low. In the period since the introduction of the Act, we have not become aware of any instances of slavery or human trafficking relating to our business. We regard the areas of potential risk to be that our tenants or customers are or become victims of slavery or human trafficking, and in the procurement of construction, maintenance, and office cleaning.

The steps we have taken with the aim of ensuring slavery and human trafficking does not occur in our business and supply chains are:-

- We have an appointed Lead and a named Officer for safeguarding
- We have a safeguarding group who meet regularly to discuss good practice, issues and policies
- We have checks in place to reduce the risks of tenancy fraud
- We have procedures in place for reporting any safeguarding issue including suspicion of modern slavery
- We encourage staff to raise any concerns about our business or supply chains

We have robust tendering and other processes for procurement which include:

- Our tender documentation includes provision to exclude any bidder who has been convicted of an offence under section 1, 2 or 4 of the modern Slavery Act 2015<sup>1</sup>.
- When entering into new contracts, we seek to impose provision for termination in the event of a modern slavery or human trafficking compliance breach by a supplier.

<sup>1</sup> Sections: 1. Slavery, servitude and forced or compulsory labour. 2. Human trafficking. 4. Committing offence with intent to commit offence under section 2

We review the effectiveness of the steps we are taking to eradicate slavery and human trafficking and modify our approach as appropriate. We will focus upon:-

- Continued focus upon safeguarding issues relating to our customers
- Periodic communication with staff on the issues around slavery and human trafficking to maintain awareness
- Continuing to incorporate, where appropriate, issues relating to slavery and human trafficking when we update policies and procedures

## **Training**

We take steps to ensure staff are aware that safeguarding is everyone's responsibility and that staff have the training they need to be able to identify and report modern slavery if they suspect it may be occurring which includes:-

- Staff are made aware of our slavery and human trafficking statement through our internal communications.
- Safeguarding sessions are run to raise awareness of the signs to look out for that may indicate that someone is a victim of modern slavery.
- Staff are made aware of how to report any suspicions, and we have officers trained to investigate these suspicions and take relevant action.

This statement had been approved by our board of non-executive directors.

<sup>1</sup> Sections: 1. Slavery, servitude and forced or compulsory labour. 2. Human trafficking. 4. Committing offence with intent to commit offence under section 2