



## **Statement on Modern Slavery & Human Trafficking 2020**

### 1. Introduction

This statement is intended to comply with the requirements of the Modern Slavery Act 2015 and sets out Greatwell Homes' position on slavery and human trafficking. Greatwell Homes acknowledges that modern slavery is a crime and a violation of human rights as defined by Article 4 of the Convention on Human Rights. Greatwell Homes recognises that modern slavery can take various forms including slavery, servitude, compulsory labour and human trafficking for exploitation all of which can have an adverse impact on individuals, families and communities anywhere.

This statement will be updated annually.

### 2. Organisation Structure

Greatwell Homes manages more than 80 per cent of the social housing stock within Wellingborough and the 15 surrounding villages, with approximately 5000 homes in ownership and 150 employees it continues to expand across the Borough borders. Undertaking housing, regeneration, community development, support services as well as a range of community and social activities, Greatwell Homes is the largest local landlord within the Borough of Wellingborough.

### 3. Compliance

Greatwell Homes has a zero-tolerance approach to modern slavery and this statement is communicated via the intranet to all employees, and shared with suppliers, contractors and business partners.

While a supplier of services to individuals and communities, Greatwell Homes does not have a specific policy on slavery and human trafficking because it is thought that a policy with such a narrow focus is inappropriate for an issue that cuts across the whole organisation. However, as Greatwell Homes does recognise that slavery and human trafficking is a potential risk this is addressed through the following related policies:

- Whistleblowing Policy
- Grievance Policy
- Disciplinary Policy
- Recruitment Policy
- Procurement Policy
- Safeguarding Policy
- Financial Crimes Policy

#### 4. Supply Chain

A key area of risk lies in supply chain relationships i.e. contractors, sub-contractors, sub-sub-contractors and/or suppliers, sub-suppliers etc. where Greatwell Homes has a moral duty to do what it can to ensure it is not complicit, so far as we are reasonably able to do so. Greatwell Homes' Procurement Policy and Procurement Procedure (both mandatory reads for all staff) therefore promotes awareness of modern slavery throughout the organisation.

Greatwell Homes' supply chains cover Goods, Services and Works necessary to:

- Deliver front line services to the customers in properties we manage
- Build new homes
- Support the "back-office" services that keep the business operating.
- Invest in Existing Homes.

Our procurement activity is governed by the Public Contracts Regulations and our own internal Financial and Contract Regulations which require formal quotation or tenders for all higher value purchases.

However, in this context, Greatwell Homes does not operate in a high-risk environment although cannot be complacent. Visibility of the supply chain below Tier 1 i.e. beyond those with whom we directly contract is limited and therefore Greatwell Homes is heavily reliant on those Tier 1 contractors.

## 5. Next Steps

As an organisation, Greatwell Homes has started to examine what Tier 1 contractors are themselves doing to promote awareness of and prohibit modern slavery and this work will continue moving forward.

Realistically though, Greatwell Homes has to place the investigation of supply chains below the Tier 1 level in the context that auditing supply chains can be both difficult and expensive. Therefore, a risk-based pragmatic approach to the exercise will be adopted with resources needing to be prioritised to service delivery.

Currently, as part of the tender or quotation process all Tier 1 suppliers must make a declaration of their relevance as a company defined by Section 54 of the Modern Slavery Act 2015 and if they confirm they are a relevant company they are asked for evidence of compliance as part of the Selection Questionnaire

At this stage Greatwell Homes does not envisage specific performance indicators in this area unless a high-risk is identified, which can be cost-effectively monitored and influenced.

All staff at Greatwell Homes will continue to be empowered to report any concerns arising from communication with customers as stated in the Safeguarding Policy and Procedures.

The Procurement Manager and key members of staff will be encouraged to take the Chartered Institute of Procurement & Supply (CIPS) Ethics Training and Test which covers all relevant aspects.

## 6. Conclusion

Greatwell Homes is proud of the steps already taken to combat the risk of modern slavery and human trafficking being present within business and supply chains.

Currently, Greatwell Homes does not meet the criteria that requires the statutory publication of an annual modern slavery and statement, however, such is the commitment this statement is published on a voluntary basis exemplifying Greatwell Homes' commitment to continue to being vigilant and improving practices further in the is area in the future.

This statement is approved by the

Greatwell Homes Executive Managers Team

Tuesday 21<sup>st</sup> January 2020