

# Anti-Slavery and Human Trafficking Statement 2019/2020

Slavery and forced labour can take many forms, including human trafficking and child labour. Thirteen Housing Group (Thirteen) will not tolerate forced labour or child labour in any aspect of business and are fully committed to acting ethically and with integrity in all business dealings and relationships.

Thirteen holds itself and its supply chain fully accountable and will strive to adhere to the provisions of the Modern Slavery Act 2015.

## **Organisational Structure, Business and Supply Chains**

Thirteen is a caring landlord, housing developer and a social purpose business that uses commercial expertise to meet key priorities. It is the largest landlord group in the North East, owning and managing around 34,000 properties. Over 1,500 employees reach out to more than 70,000 customers, putting them at the heart of everything we do to help shape the business. Thirteen strives to be the best and to constantly make improvements.

Our reason for being is to provide good quality homes and support for those in housing need. With a wealth of experience and capacity and strong partnerships Thirteen is dynamic and flexible in finding solutions.

During 2018/2019, Thirteen spent £92 million through its supply chain, in which it manages projects and procurements where works, services and goods are sourced from National and International suppliers. The majority of these products are not sourced directly, but are sourced by our contracted suppliers of services, goods and works.

Further information is available on our website [www.thirteengroup.co.uk](http://www.thirteengroup.co.uk)

## **Brief of Areas/Policies that cover Slavery and Human Trafficking**

Thirteen will do whatever it can to combat slavery and human trafficking. Our anti-slavery and human trafficking statement reflects commitment to acting ethically, vigilantly and with integrity in all business relationships and implementing and enforcing systems and controls that seek to ensure slavery and human trafficking is not taking place in any of our homes or supply chains. Thirteen will not support or deal with any business knowingly involved in slavery or human trafficking in any part of its operations.

Any instances of non-compliance will be assessed on a case by case basis and remedial action tailored appropriately.

We will only trade with organisations who fully comply with this policy.

The three main areas of risk in relation to human trafficking and slavery within Thirteen are:

1. Supply chain.
2. Employment and recruitment.
3. Letting and use of properties.

#### High Risk Areas/Steps to Assess Risk

Details of actions taken are included in the due diligence sections below.

We will continually carry out risk analysis which will identify processes, procedures or actions that are required to further reduce the possibility of human trafficking and slavery by those working with and for Thirteen.

#### **Training Staff**

Thirteen ensures that e-learning training is delivered to all internal customer facing staff focusing on safeguarding, slavery and human trafficking requirements and individual responsibilities.

#### *Actions 2018/19*

- Between September and November 2018 we rolled out a new Procurement Code of Practice which included a section on Modern Slavery. We updated every service area of the business on Modern Slavery during this activity including what constitutes modern slavery, how this may apply in a sourcing situation and how increased vigilance/ awareness can prevent it.

#### *Proposed Actions 2019/20*

- Thirteen continues to roll out this training during 2019/20 to include all colleagues.

#### **Due Diligence in Supply Chains**

We continue to take steps to ensure there is no modern slavery or human trafficking within our supply chain.

Actions to date are as follows:

- All contracted spend utilises standard terms and conditions, which include a clause that the incumbent contractor must comply to the Modern Slavery Act 2015;
- When Thirteen's terms and conditions are not used, the Modern Slavery Act 2015 is a bespoke clause added to these individual contracts.
- For non-contracted spend of low value, purchase orders detail the standard terms and conditions of business which include a clause that the incumbent contractor must comply with the Modern Slavery Act 2015.
- Our standard tender documentation includes a pass/fail section relating to the Modern Slavery Act 2015.

- Thirteen's standard terms and conditions are located on our business website to provide consistency and transparency.
- The delivery of e-learning training to all internal customer facing staff focusing on safeguarding requirements and individual responsibilities.
- A section on modern slavery is now included in a Company-wide refresher on Procurement procedures.
- All members of the Procurement team have completed the CIPS Ethical Procurement module in addition to complying with Thirteen's ethics policy.

### **Due Diligence in Recruitment**

All potential employees must complete the following checks prior to being appointed:

- Proof of eligibility to work in the UK in accordance with the Asylum and Immigration act 1996;
- Unspent convictions
- Health declaration
- Discloser and barring service identity form (depending on the role applied for).

*Actions 2019/20:*

- Work will continue to assess temporary staff to ensure that all appropriate documentation is in place. Work to complete a procurement exercise relating to recruitment agencies is scheduled for 2019 and will ensure that any temporary staff have completed the same pre-employment checks as staff employed directly by the Group.

### **Due Diligence in Property Letting**

All adults who will be occupying a dwelling undergo Right to Rent checks confirming:

- Their right of residence;
- Their work/economic status;
- Tenancy reference checks and three years' housing history;
- Sub-letting is not permitted under the tenancy agreement;
- New tenants are visited within four weeks of tenancy commencement;
- Further visits are carried out after three months and seven months to capture any tenancy issues.

*Actions for 2019/20:*

- Thirteen continues to work in partnership with other agencies, including the Police and Local Authorities to identify cases of slavery and human trafficking and support appropriate remedial action. Thirteen is represented on the Cleveland Anti-Slavery Network.
- To reassess the requirement for programmed tenancy checks for long term tenants.

**This statement is made under Section 54(1) of the Modern Slavery Act 2015. It constitutes Thirteen's slavery and human trafficking statement for the financial year ending 31 March 2019.**

**The turnover of the Group exceeds £36million for that period.**

**This statement is approved by Thirteen's Leadership Team and Board and applies to all organisations within the Group. It will be reviewed and updated as necessary or on an annual basis.**

**This statement is visible on the Thirteen website. [www.thirteengroup.co.uk](http://www.thirteengroup.co.uk)**