

# **Anti-Slavery and Human Trafficking Statement 2025/2026**

Slavery and forced labour can take many forms, including human trafficking and child labour. Thirteen Housing Group will not tolerate forced labour or child labour in any aspect of its 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 strives 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 owns and manages around 35,000 properties, providing affordable homes, sheltered and supported housing and home ownership options, with a turnover of £200million.

Over 1,500 employees reach out to more than 72,000 customers, putting them at the heart of everything Thirteen does. We strive 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 2023-2024, we spent £176.5 million through our supply chain, in which we manage projects and procurements where works, services and goods are sourced from National and International suppliers. Most 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/Human Trafficking**

We will do whatever we 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.

We 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/Recruitment.
3. Letting and use of properties.

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

Details of actions taken and those proposed for 2025/26 to further reduce the possibility of human trafficking and slavery by those working with and for Thirteen are included in the due diligence sections below.

#### **Training Staff / Awareness**

To promote understanding and awareness of Modern Slavery we have access to Teeswide Safeguarding Adults Board (TSAB) e-learning package for all colleagues. We take opportunities for further awareness via training webinars and events provided by other agencies.

The Cleveland-wide Victim Care Pathway, which details the reporting mechanisms and support available to those who are found to be victims of modern slavery is available on the intranet. We also support the Cleveland Wide Anti-Slavery Network.

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

We continue to take steps to ensure that there is no modern slavery or human trafficking within our supply chain. 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 will be a bespoke clause added to these individual contracts. For non-contracted spend of low value, Thirteen's purchase orders detail the standard terms and conditions of business which includes a clause that the incumbent contractor must comply with the Modern Slavery Act 2015.

The Procurement Act 2023 Policy Note 009 states that there is a requirement for supply chain information to be provided for new procurements designated as having a high risk of modern slavery. There is also additional guidance on enhanced due diligence activities and on using existing exclusion grounds more effectively. We already include a modern slavery risk assessment in our contract risk registers. Existing contract risk registers are reviewed annually.

Our standard tender documentation includes a pass/fail section relating to the Modern Slavery Act 2015. Thirteen's standard terms and conditions, which include a clause relating to the Act are located on our business website to provide consistency and transparency.

The delivery of e-learning training to all internal customer facing colleagues focuses on Safeguarding requirements and individual responsibilities. A section on Modern Slavery is now included in the company wide Procurement procedures. All members of the Procurement Team have completed the CIPS Ethical Procurement module in addition to complying with Thirteen's Transparency Policy.

### **Due Diligence in Recruitment**

All offers of employment are subject to the following checks prior to an offer being confirmed.

- Two suitable references
- Proof of eligibility (and identification) to work in the UK in accordance with the Asylum and Immigration act 1996.
- Unspent convictions
- Health declaration
- Disclosure and barring service identity form (depending on role).

We contract with recruitment agencies that are part of our preferred supplier list and ensure that they undertake the necessary checks on staff, ensuring evidence of those checks, where the role is fixed term, are sent to us for our records.

During 2024/25 we continued to remain vigilant and compliant with the above checks in our recruitment process, ensured that our processes continued to be in line with best practice and legislation; whilst at the same time, continued to contract with recruitment agencies that are part of our preferred supplier list.

#### *Actions 2025/26*

- Anti-slavery and human trafficking awareness is covered in the hiring manager training plans in 2025.

### **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 are sought.

In addition:

- Sub-letting is not permitted under the tenancy agreement.
- New tenants are contacted via telephone or visit within seven days of tenancy commencement.
- Follow up visits are carried out as agreed with the customer.
- Further visits carried out after seven months to see how the tenancy is progressing and offering support and guidance where needed.

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- MyThirteen and the relevant Local Authority lettings platforms enables an audit trail of enables an audit trail of documentation in relation to evidence that needs to be supplied to support the application alongside digital sign-up capability within the system.

### *Actions 2025/26*

- Tenancy fraud cases will be categorised for monitoring and reporting to DWP where necessary.

**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 2024.**

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

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

**This statement and previous statements are visible on our website. [www.thirteengroup.co.uk](http://www.thirteengroup.co.uk)**