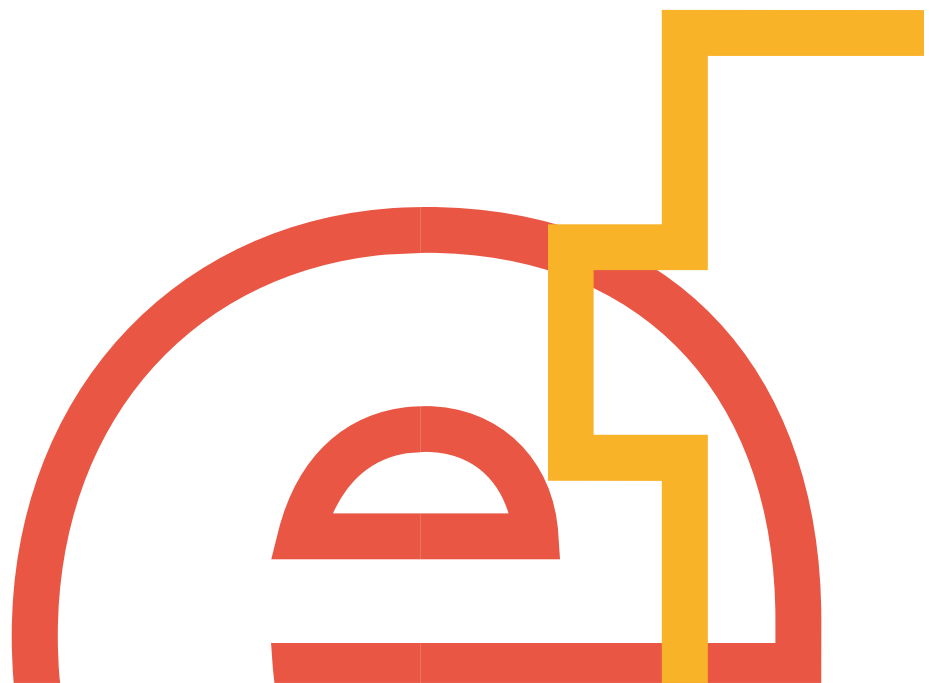


**thirteen**

Managing and building homes

**Anti-Slavery and Human  
Trafficking Statement  
2018/2019**



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 business and are fully committed to acting ethically and with integrity in all business dealings and relationships.

The Group holds itself and their 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 Housing Group is a caring landlord, housing developer and a social purpose business that uses commercial expertise to meet key priorities. The Group is the largest landlord group in the North East, owning and managing just under 34,000 properties in the Tees Valley area.

Over 1,500 employees reach out to more than 70,000 customers, putting them at the heart of everything Thirteen Housing Group does to help shape the business. The Group strives to be the best and to constantly make improvements.

The Group's 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 the Group is dynamic and flexible in finding solutions.

During 2017-2018, Thirteen Housing Group spent £91million 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 the Group's website [www.thirteengroup.co.uk](http://www.thirteengroup.co.uk)

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

Thirteen Housing Group will do whatever it can to combat slavery and human trafficking. The Group's 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 Housing Group 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.

Thirteen Housing Group 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 Housing Group are:

1. Supply Chain.
2. Employment/Recruitment.
3. Letting and use of properties.

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

Details of actions taken during 2017-2018 are included in the due diligence sections below.

Within the three areas detailed above the Group 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 Housing Group.

### **Training Staff**

During 2016-2017, Thirteen Housing Group ensured that e-learning training was delivered to all internal customer facing staff focusing on safeguarding, slavery and human trafficking requirements and individual responsibilities.

The Group continued to roll out this training during 2017-2018 to include all members of staff.

For 2018-2019 we are rolling out a new Procurement Code of Practice which includes a section on Modern Slavery. We will take the opportunity to discuss Modern Slavery with each of our service areas during this activity.

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

Thirteen Housing Group have taken steps to ensure that there is no modern slavery or human trafficking within their supply chain;

Actions to date are as follows:

- All contracted spend from March 2015 utilises standard terms and conditions, which include a clause that the incumbent contractor must comply to the Modern Slavery Act 2015;
- From March 2015 when the Groups 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, the Group'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 Group's standard tender documentation includes a pass/fail section relating to the Modern Slavery Act 2015.
- The Group's standard terms and conditions, which include a clause relating to the Modern Slavery Act 2015; 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.

- The introduction of a specific set of clauses relating to safeguarding within the Group's standard terms and conditions.
- The Group's standard tender documentation include a pass/fail section relating to safeguarding.

2017/2018 Actions:

We continued to identify high risk areas of the supply chain, communicating with key stakeholders/service units.

All members of the Procurement team completed a CPD (Continuous Professional Development) via CIPS (Chartered Institute of Purchasing and Supply) module focusing on Modern Slavery/Ethical Procurement.

Actions for 2018-2019:

A section on Modern Slavery will be included in a Company-wide refresher on Procurement procedures late 2018 and any new members of the Procurement team will undertake the CIPS Ethical Procurement module in addition to complying with Thirteen's Ethics Policy.

### **Due Diligence in Recruitment**

All potential employees who wish to work for Thirteen Housing Group 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 for 2018-2019:

We will continue to assess temporary staff to ensure that all appropriate documentation is in place. During 2017 the Group completed an organisation reshape. This has delayed the work to complete a Procurement exercise relating to recruitment agencies. This work is now scheduled for late 2018 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 are sought;
- Sub-letting is not permitted under the tenancy agreement;
- New tenants are visited within four weeks of tenancy commencement; and

- Further visits are carried out after three months and seven months to capture any tenancy issues.

Actions for 2018-2019:

To continue 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.

To reassess the requirement for programmed tenancy checks for long term tenants.

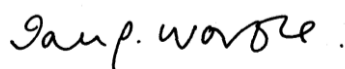
**This statement is made under Section 54(1) of the Modern Slavery Act 2015. It constitutes the Group's slavery and human trafficking statement for the financial year ending 31 March 2018.**

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

**This statement is approved by Thirteen Housing Group's Leadership Team and Group 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 Housing Group website.**

**[www.thirteengroup.co.uk](http://www.thirteengroup.co.uk)**



**Ian Wardle**  
**Group Chief Executive**



**George Garlick**  
**Chairman**