

# **Anti-Slavery and Human Trafficking Statement 2021/2022**

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 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 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 2020-2021, we spent £95 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 2021/22 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**

##### *Actions 2021 – 2022*

- Continue raising the awareness of Modern Slavery through e-learning packages.
- Look to reschedule National Crime Agency awareness training around Human Trafficking, Child & Adult Sex Exploitation and Criminal Exploitation., which did not take place 20/21 due to Covid.
- Support and promote Anti-Slavery Day on 18 October 2021.
- Contribute to the work of the Cleveland Wide Anti–Slavery Network.
- Make available through Channel 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.
- Publish our Anti-Slavery Statement on the Governments Modern Slavery statement registry ([Modern slavery statement registry - GOV.UK \(modern-slavery-statement-registry.service.gov.uk\)](https://www.gov.uk/modern-slavery-statement-registry.service.gov.uk))

#### **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.

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 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

- 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 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 colleagues 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 transparency policy.

#### *Actions 2020 – 2021*

Make available through our tender portal the '**modern slavery SME Toolkit**'. A practical guide and assessment for SMEs on how to mitigate the risk of modern slavery in their operations.

Promote the toolkit through our social media pages.

#### **Due Diligence in Recruitment**

All potential employees who wish to work for Thirteen 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 2020 - 2021:*

Continue to contract with those recruitment agencies that were successful through our procurement process. The requirements for pre-employment checks to be undertaken on temporary staff recruited via these agencies in line with those directly employed by Thirteen.

#### **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 contacted via telephone or visit with seven days of tenancy commencement.
- Welcome visit undertaken within four weeks of the tenancy commencing
- Further visits carried out after seven months to how tenancy is progressing. Offering support and guidance where needed

*Actions for 20201 - 2022:*

Continue with the rollout of 'My Thirteen' supporting the journey of our customers to find and manage their home

**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 2022.**

**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)**