

Slavery and Human Trafficking Statement

Introduction

This statement is made in accordance with Part 6 Section 54 (1) of the Modern Slavery Act 2015 and constitutes South Yorkshire Housing Associations' (SYHA) slavery and human trafficking statement for the financial year April 2017 to March 2018.

SYHA operates a zero tolerance policy towards slavery and human trafficking and is committed to ensuring it doesn't occur in our supply chains or in any part of our business.

This statement has the support and approval of our board of directors. Managers and staff are expected to report any evidence that slavery and human trafficking is taking place.

Organisational structure

SYHA is a charitable housing association registered society under the Co-operative and community benefit Societies Act 2014.

It owns and manages around 6,000 properties, and provides a range of care and supported housing services. It has two active subsidiaries - another provider of social housing, and an estate agency.

Our supply chains / due diligence

SYHA operates entirely in the UK, and largely in highly regulated sectors. Many of its contracts are with public sector organisations. It sources goods and services almost exclusively from UK based suppliers.

We have policies in place which help mitigate the risk of slavery and human trafficking within our business:

- Safeguarding Adults Policy
- Safeguarding Children and Young People Policy
- Whistleblowing Policy
- Equality & Diversity
- Anti-bribery Policy
- Recruitment Policy
- Probity Policy

To mitigate the risk existing in our supply chain generally, we have an approved procurement policy, which abides by the Public Contracts regulations 2015 and includes the following:

- Spend over a certain threshold is subject to selection and award criteria which reflect our organisational ethos in the policy areas mentioned above
- Suppliers who tender for our services are required to inform us if their organisation or their sub-contractors have had a complaint upheld following an investigation by the Equality and Human Rights Commission

We have assessed the nature of our activities and supply chain, and consider risk generally to be low.

We regard the areas of potentially higher risk to be that some of our tenants or customers are victims of slavery or human trafficking, and in the procurement of construction, maintenance, and office cleaning.

The steps we have taken so far to ensure slavery and human trafficking doesn't occur in our business and supply chains are:

- We have an appointed Lead and a named Officer for safeguarding
- We have a safeguarding group who meet regularly to discuss good practice, issues and policies
- We have checks in place to reduce the risks of tenancy fraud
- We have procedures in place for reporting any safeguarding issue including suspicion of modern slavery
- We encourage all staff to raise any concerns about any part of our business or supply chains

We have robust, documented, tendering and other processes for procurement which include:

- Our tender documentation includes provision to exclude any bidder who has been convicted of an offence under section 1, 2 or 4 of the modern Slavery Act 2015¹.
- In new contracts that we enter into we seek to impose provision for termination in the event of a modern slavery or human trafficking compliance breach by a supplier.

We will continuously review the effectiveness of the steps we are taking to eradicate slavery and human trafficking and will modify our approach as appropriate.

Areas for focus include:

- Review the need for further training for staff, particularly those involved in procurement and frontline staff dealing with our customers
- Continue to review our existing policies and procedures

¹ Sections: 1. Slavery, servitude and forced or compulsory labour. 2. Human trafficking. 4. Committing offence with intent to commit offence under section 2

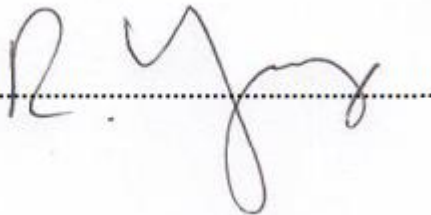
Training

We have taken a number of steps to ensure staff are aware that safeguarding is everyone's responsibility and they have the training they need to be able to identify and report modern slavery if they suspect it may be occurring which includes:-

- All staff are made aware of our slavery and human trafficking statement through our internal communications.
- Safeguarding sessions are run to raise awareness of the signs to look out for that may indicate that someone is a victim of modern slavery.
- Staff are made aware of how to report any suspicion they have and we have officers trained to investigate these suspicions and take relevant action.

This statement had been approved by our board of non-executive directors.

Signed:

A handwritten signature in black ink, appearing to read 'R. Young', is written over a horizontal dotted line. The signature is fluid and cursive.

Rob Young, Finance Director

¹ Sections: 1. Slavery, servitude and forced or compulsory labour. 2. Human trafficking. 4. Committing offence with intent to commit offence under section 2