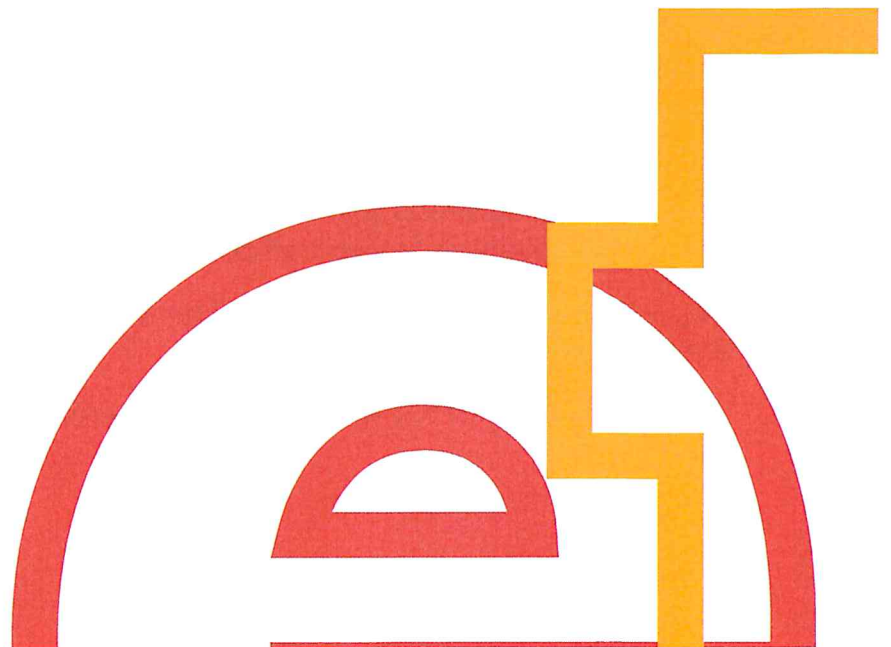


thirteen
Managing and building homes

**Anti-Slavery and Human
Trafficking Statement
2017/2018**



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 are 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 Groups 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 2016/2017, Thirteen Housing Group spent £88million 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

Brief of Areas/Policies that cover Slavery/Human Trafficking

Thirteen Housing Group will do whatever it can to combat slavery and human trafficking. The Groups 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 2015/2016, 2016/2017 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 has ensured that e-learning training has been delivered to all internal customer facing staff focusing on safeguarding, slavery and human trafficking requirements and individual responsibilities.

The Group will roll this training out further during 2017/2018 and include all members of staff as well as investigate the possibility of including the training for trade operatives via their mobile hand held devices.

Further communications throughout the Group will take place as well as the publication of a dedicated section of the group's internal communication site 'Channel' focusing on Modern slavery. This will include further information on recognising the possible signs of Modern slavery and how to report it with the publication of the national helpline number and web address.

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 groups 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 Groups standard tender documentation include a pass/fail section relating to the Modern Slavery Act 2015.
- The Groups standard terms and conditions, which include a clause relating to the Modern Slavery Act 2015; are located on our business website to provide consistence 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 Groups standard terms and conditions.
- The Groups standard tender documentation include a pass/fail section relating to safeguarding.

2016/2017 Actions:

To identify high risk areas of the Groups supply chain which could be affected by human trafficking and slavery and manage risk accordingly. This is unlikely to be Tier 1 contractors/supplier, but lower down the supply chain and at a lower value. Once the risk assessment is complete, an action plan to mitigate risk is required.

2016/2017 Results:

Work has begun with regard to identifying high risk areas of the Groups supply chain and engaging with the necessary stakeholders/service units to complete risk assessments/managing risk. This action is a work in progress and will follow into the Actions for 2017/2018.

Actions for 2017/2018

The continuation of identifying high risk areas of the supply chain and communicating with key stakeholders/service units as well as looking at the possibility of introducing supplier audits with a minimum number of audits per quarter.

All members of the Procurement team will also complete a CPD (Continuous Professional Development) via CIPS (Chartered Institute of Purchasing and Supply) module focusing on Modern Slavery/Ethical Procurement, this module will assist in completing risk assessments/managing risk within the supply chain going forward.

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).

2016/2017 Actions:

The appointment of agency staff and staff placements has been identified as an area requiring further assessment of the actions needed to minimise the risk of slavery and human trafficking. The group will assess the risk and requirements and implement processes dependant on its findings.

2016/2017 Results:

Currently the Group engages with many Temporary staff agencies, all of which are off contract with no real consistency on the approach or assessment of candidates.

However, the Group is currently re-scoping requirements for agency staff placements with the plan to run a fully compliant procurement exercise via a suitable consortium framework and awarding long term contracts with preferred suppliers later this year (17/18).

Actions for 2017/2018

All of the suppliers on the chosen framework will have been assessed from a commercial and technical perspective, however Modern slavery, human trafficking risks will all be taken into account during the re-scoping/procurement exercise with any temporary staff completing the same pre-employment checks as staff who are employed direct 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.

2016/2017 Actions:

There are currently no programmed tenancy checks for long-term tenants. The Group needs to consider carrying out tenancy checks periodically throughout the duration of the tenancy, and what should be included in these tenancy checks.

The Safeguarding Training will be expanded to include slavery and human trafficking.

We will 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.

2016/2017 Results:

The safeguarding training has been expanded throughout the group to include slavery and human trafficking, however with regard to the programmed tenancy checks a risk based approach will be considered in line with the Group re-structure, business objectives.

Actions for 2017/2018

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



Ian Wardle
Group Chief Executive



George Garlick
Chairman

