



**Your Homes  
Newcastle**

**Your Homes Newcastle (YHN)**

**Slavery and Human Trafficking Statement**

**Financial Year Report - 2018 / 2019**

## Introduction

Your Homes Newcastle ("the company") is a not-for-profit Arms-Length Management Organisation (ALMO) and a wholly owned subsidiary of Newcastle City Council. We were set up in 2004 to manage the Council's properties, to improve housing in order to meet the Government's Decent Homes standard and to provide a range of support services for Newcastle City Council and other landlords. We currently manage:-

- 27,400 council and leasehold homes on behalf of Newcastle City Council; and
- Over 750 homes on behalf of Leazes Homes.

## Our Structure, Business and Supply Chains

We have a group structure with Your Homes Newcastle as the parent company along with two subsidiaries. The two subsidiaries are Asfaleia Limited a charitable subsidiary, and Abri Trading Limited, a trading subsidiary.

- Your Homes Newcastle provides our core housing management and administrative functions;
- Asfaleia Limited delivers our community care alarm service, sheltered housing service, young peoples' service, advice and support service and employability services; and
- Abri Trading Limited includes the Newcastle Furniture Service (NFS) and Palatine Beds.

Further information about our activities is detailed on our web site at

<http://www.yhn.org.uk/>

Our tier one supply chain is made up of UK/European based Suppliers. Total buying value in 2018/2019 for the group was £9.78m across 359 Suppliers with the top 5% (20) of Suppliers accounting for just over 78% (£7.67m) of expenditure. The main categories are summarised below: -

White Goods, Small Electrical & Furniture Items for NFS	£2.75m (28%)
Information Technology & Telephony	£1.44m (15%)
Healthcare Services	£0.32m (3%)
Utilities	£0.21m (2%)
Printing	£0.17m (2%)
Miscellaneous Other	<u>£4.90m (50%)</u>
<b>TOTAL</b>	<b><u>£9.79m (100%)</u></b>

n.b. Please note that the figure relating to 'Raw materials to manufacture beds for Palatine' which is usually included within this category detail is not yet available and therefore can't be included within this Report.

### **Policies in Relation to Slavery and Human Trafficking**

YHN has a zero-tolerance approach to any form of modern slavery and trafficking. This is supported by our Modern Slavery Policy that was developed and implemented during 2016/2017. As well as setting out our approach the Policy details how it will be communicated and how we will ensure compliance, as well as deal with any breaches.

During 2018, we agreed that Your Homes Newcastle would align their Procurement Procedure Rules to Newcastle City Council's and we have been working with the Council to replace our Corporate Procurement Strategy with a new Commissioning and Procurement Plan which can be found on our external website.

The new Plan is supported by a number of Policies including Anti Bribery, Fraud and Corruption, Whistle blowing and Corporate Equality, as part of our Public Sector equality duty which includes the elimination of unlawful discrimination.

During 2019, a combined Modern Slavery Policy will be developed in conjunction with Newcastle City Council for implementation Autumn 2019.

YHN are also committed to continually assess the recruitment procedures and practices in order to comply with current employment legislation, and recruit staff according to best practice. During 2016/2017 we updated our Employee Code of Conduct and Whistleblowing Policies to include reference to Modern Slavery. Equality impact assessments are also carried out on all HR related Policies to ensure they promote equality of opportunity.

Finally, as an organisation we have been assessed as excellent under the Social Housing Equality Framework and are a Stonewall top 100 employer 2019 (ranked 77<sup>th</sup>), demonstrating our commitment to equality.

### **Due Diligence Processes in Relation to Slavery and Human Trafficking in our Business and Supply Chains**

As a group we are governed by the Public Contract Regulations 2015 (as amended), which are underpinned by our Financial Regulations. As part of our commissioning and procurement activity, Suppliers are assessed for their suitability to perform the Contract specification using a Supplier Selection Questionnaire (SQ) which incorporates requirements for Modern Slavery checks relating to a Supplier's economic and financial standing, as well as compliance with Labour Law. In addition, our standard Contract terms require our Suppliers to adhere to all of our Policies and Rules, together with compliance at all times with the Law, including specifically the Modern Slavery Act, in the performance of the Contract.

**Parts of our Business where there is a risk of Slavery and Human Trafficking taking place, and the steps we have taken to assess and manage that risk.**

We have analysed our third party spend and categorised the supply areas we think are most at risk of modern slavery. The areas we think that are most at risk are due to their relatively high level of spend and the lack of supply chain visibility below our tier one Suppliers: -

- Supplies of white goods, small electrical and furniture items for NFS.
- Supplies of raw materials to manufacture beds for Palatine (figures not yet available).

During 2016/2017 we undertook the mapping of our NFS supply chain, securing the signed commitment to tackle Modern Slavery and action plan from our first-tier Supplier. They in turn secured the same commitment from the majority of our second-tier Suppliers. Going forward we continue to pursue any outstanding commitments and plan to undertake a similar exercise for the raw material Suppliers to Palatine Beds.

**Effectiveness in ensuring that slavery and human trafficking is not taking place in our business or supply chains**

We are confident that slavery and human trafficking is not taking place amongst our first-tier Suppliers due to the due diligence processes that we currently have in place. Whilst we cannot be as certain that slavery and human trafficking is not taking place further down our Supply Chains, since the introduction of our new Policy and revised procedures, together with the work we have undertaken in conjunction with our NFS supply chain, we have had no reported instances of Modern Slavery.

**Training about slavery and human trafficking available to staff**

Since 2016/17, Modern Slavery training has been incorporated into our Safeguarding Adults and Children Level 1 and Level 2 training, which is mandatory for all staff who may have to make a safeguarding alert. In addition, Supplier guidance in relation to Modern Slavery has also been developed and made available on our website.

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved and published by the YHN Board and will be reviewed annually.

Signed: *Joyce McCarty*

Position: *Director / Vice Chair*

Date: *2 August 2019*