

Your Homes Newcastle (YHN)

Slavery and Human Trafficking Statement

Financial Year 2017 / 2018

#### 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 600 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 housingmanagement 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 2017/18 for the group was £6.7m across 406 suppliers with the top 5% (20) of suppliers accounting for 75% (£5.1m) of expenditure. The main categories are summarised below:-

White goods, small electrical and furniture items for NFS	£2.3m (35%)
Information technology and telephony	£0.8m (12%)
Raw materials to manufacture beds for Palatine	£0.8m (11%)
Healthcare Services	£0.2m (1%)
Utilities	£0.3m (4%)
Printing	£0.1m (2%)
Miscellaneous Other	£2.2m (33%)
TOTAL	£6.7m (100%)

### 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 2016/17. 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.

In addition, we have a comprehensive Corporate Procurement Strategy, 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.

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 2016/17 we updated our Employee Code of Conduct and Whistleblowing Policies to include reference to Modem 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 2018 (ranked 47th). demonstrating our commitment to equality.

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

As a group we are governed by the Public Contract Regulations 2015, which are underpinned by our Financial Regulations, incorporating a comprehensive supplier accreditation process. This includes, as appropriate, a supplier suitability or prequalification questionnaire containing checks relating to a supplier's economic and financial standing, as well as compliance with labour law. We have also updated our procurement documentation and introduced a Supplier Code of Conduct which sets out the standards, including those relating to Modern Slavery, expected from our suppliers when doing business with us.

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.

31/7/18

# 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.

During 2016/17 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 secondtier 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 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:

& Boade Position:

Date: 31 7 18