



Incommunities Group Limited Modern Slavery and Human Trafficking Statement

1 Introduction from the Chief Executive

As a Registered Provider of social housing, we recognise our duty to combat modern slavery and human trafficking in all of its forms. We take steps to ensure it is not part of our business or our supply chains. This Modern Slavery and Human Trafficking Statement is an expression of our commitment to continuing to combat the tragic trade in human life.

Incommunities is committed to taking a balanced approach to combat Modern Slavery and Human Trafficking. We will combine support and assistance to tackle Modern Slavery and Human Trafficking with swift and proportionate enforcement action if it is identified in our organisation or any of our supply chains

2 Organisation's structure

Incommunities is one of the largest social housing providers in the UK. We provide affordable, high quality homes, principally for rent in neighbourhoods across the Bradford District and South and West Yorkshire.

We currently own nearly 21,300 homes for rent and have almost 1,000 leasehold properties. We offer a range of housing options and services aimed at meeting the needs of our local communities and employ approximately 1,000 people. Our vision is Improving Lives Incommunities. We believe that everyone should have the opportunity to fulfil their potential and communities should be great places to live.

3 Our supply chains

Our supply chains are those you would normally expect for a housing association.

We do the following to tackle modern slavery and human trafficking in our supply chains:

- Striving to identify parts of our supply chain where the risk of modern slavery is higher and then monitoring them.
- Protecting whistle-blowers by applying the Incommunities Group Whistleblowing Policy so that genuine reports of suspected modern slavery in our supply chain are encouraged.
- Providing training to staff who are involved with supply chains to help them to recognise the signs of modern slavery and know what to do if they suspect it, so that action can be taken.
- Placing supply chain partners under contractual obligations to put similar antislavery measures in place, including the suggested clauses in Appendix 1 of our Anti-slavery Policy.

4 Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

5 Training

Incommunities Group has many staff members who work in our neighbourhoods and visit people's homes. They act as 'eyes and ears', so they are ideally placed for identifying the signs of modern slavery and have a safeguarding duty to report it.

In order to promote the reporting and tackling of modern slavery and human trafficking:

- We include modern slavery within our safeguarding training to enable staff to identify clues, and make staff aware of their duty to report known and suspected incidences of abuse.
- All Neighbourhood Officers, IHM staff and Repairs Operatives are required to consider the 'Spot the Signs' and 'How to Report' information at <https://modernslavery.co.uk/spot-the-signs.html>

6 Activity

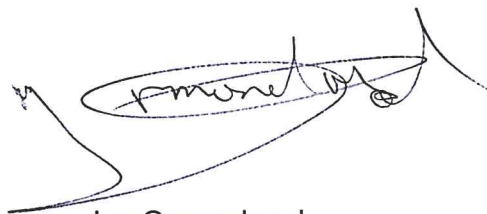
In the past year, we have undertaken activity to assist other agencies to tackle modern slavery. To do this, we have drawn upon our CCTV Centre to provide surveillance intelligence and evidence. We have also utilised our staff to reach out in areas where a modern slavery problem was suspected. For operational security reasons, we cannot provide details of these activities because this is a public statement.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. The law defines modern slavery as 'holding a person in slavery or servitude or requiring a person to perform forced or compulsory labour.' It defines human trafficking as 'arranging or facilitating the travel of another person with a view to exploiting them'

This Statement constitutes Incommunities' Modern Slavery and Human Trafficking Statement for the financial year ending 31 March 2018.



Geraldine Howley
Chief Executive
Incommunities Group Ltd



Jan Ormondroyd
Chair
Incommunities Group Ltd