

policy



Anti-slavery

Responsible Officer:	Assistant Chief Executive Resources
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Anti-slavery Policy

1.0 Introduction

- 1.1 Modern slavery is a crime and abuse of human rights. The Modern Slavery Act 2015 was introduced to tackle slavery and requires that, as a large commercial organisation, Incommunities proves the steps we take to counter Modern Slavery in our supply chain.
- 1.2 Incommunities believes that all people have the right to live their lives free from abuse. Incommunities is therefore committed to fighting modern slavery in any parts of our supply chain and any part of our business alongside concern about the safeguarding of residents in our homes, and vulnerable clients who may approach us for housing and other services.

2.0 What is modern slavery?

- 2.1 Modern slavery can occur in various forms, and is defined as; the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation, including domestic servitude, selling of organs, forced labour, sexual exploitation, criminal exploitation.(Current definition GOV.UK) In the housing sector the potential risk areas for both contracting and procurement and in our neighbourhoods are
 - Forced or trafficked labour as construction contractors
 - Agencies that supply care workers
 - Suppliers of repair and maintenance services
- 2.2 Poverty, debt, limited opportunities at home, lack of education, unstable social and political conditions including war, substance abuse, mental health issues and homelessness all contribute to the exploitation of people.
- 2.3 Globalisation, outsourcing and complex procurement processes all contribute to pushing risk further down supply chains and hiding human rights abuses. Demand for cheaper products increases the issue further. Incommunities recognises its role in ensuring that our economy is not based on a model that allows for exploitation.
- 2.4 A particular manifestation of modern slavery relevant to Incommunities as a landlord is 'Cuckooing': a form of crime, in which drug dealers take over the home of a vulnerable person in order to use it as a base for county lines drug trafficking, storing firearms and other criminal activities. Victims of 'cuckooing' are often drug users but can include older people, those suffering from mental or physical health problems, female sex workers, single parents and those living in poverty. Victims may suffer from other forms of addiction, such as alcoholism. Dealers often approach the victim offering free drugs to use their home. Cuckooing' involves serious organised crime groups/gangs (OCG's) taking over and moving into a property, where they use violence and threats to force the occupier to comply. Some vulnerable adults may be forced to leave their homes, making themselves homeless and leaving the gangs free to sell drugs in their absence. The OCG's then traffic drugs from the property. It's often common for OCG's to have access

to several addresses so that they can evade detection, they often move quickly between vulnerable people's homes, sometimes they take over the property for just a few hours, a couple of days or sometimes longer.

- 2.5 Linked to this is the phenomenon of 'County Lines' activity, referring to vulnerable people and children recruited into drug use by OCG's who then have a drug debt that they can never pay off, they are forced to transport, store and sell drugs in smaller county towns. 'County lines' takes its name from the phone lines used by OCG's to communicate between towns. Again this may be occurring within or around Incommunities properties
- 2.6 Incommunities has many staff, agency workers and contractors who work in our neighbourhoods and visit people's homes. They act as 'eyes and ears' and are ideally placed for identifying the signs of modern slavery in communities and have a safeguarding duty to report it.

3.0 Scope

- 3.1 We are confident that our employment arrangements for Incommunities directly employed staff complies with all applicable laws. This policy is therefore focussed on our supply chain and our role as a housing provider working in the communities we serve.
- 3.2 The purpose of this policy is to demonstrate how Incommunities will seek to prevent and address modern slavery and ensure that all Incommunities employees play their part and understand their role in preventing and addressing modern slavery - including permanent, part-time and temporary staff, placement staff, agency employees, volunteers and Board members.
- 3.3 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

4.0 Statement of Intent

- 4.1 **Incommunities is committed to preventing and addressing modern slavery and will use effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains by:**
 - Protecting our supply chain by undertaking checks and gathering undertakings from contractors via standard contract clauses. Logging instances of concern identified by Incommunities or highlighted by contractors and agreeing actions to be taken
 - Protecting whistle-blowers by applying the Incommunities 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.

4.2 **Incommunities will act ethically and with integrity in all our business relationships by:**

- Placing supply chain partners under contractual obligations to put similar anti-slavery measures in place, including the suggested clauses in Appendix 1 of this policy, or clauses of a similar nature.
- Procurement and due diligence arrangements including the inclusion in contracts of a mandatory undertaking from our contractors that they will comply with the provisions of the Modern Slavery Act 2015; including confirmation that staff and sub-contractors are trained in identifying the signs of modern slavery.
- For companies who do not produce a Modern Slavery statement annually, due to their turnover being below £36 million, we request that they sign mirror clauses and Incommunities.
- Contractual arrangements, requiring contract managers to act as 'eyes and ears' when checking development progress; and I provide guidance and clarity on how to report suspicious activity or welfare concerns.

4.3 **Incommunities is committed to fighting modern slavery in our communities.**

- We will 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.
- Incommunities have three nominated Safeguarding Leads who receive reports of safeguarding issues and to whom reports of modern slavery in communities should be directed.

5.0 **Responsibilities**

5.1 **All Staff**

- Reporting any suspicions of modern slavery in our communities to one of the Incommunities safeguarding alerting managers.
- To comply with this policy and report any potential breach of this policy by staff, board members or contractors, in accordance with the Incommunities Whistleblowing Policy.

5.2 **The Procurement Manager[currently the Director Investment & Regeneration) and officers leading on specific procurement exercises**

- Will undertake appropriate learning and development on modern slavery to allow them to contribute to tackling it.
- Work with the Learning and Development Team to provide staff members who deal with supply chains with appropriate training or awareness raising to allow them to contribute to tackling modern slavery, which will vary according to their role. For example, a Contract Delivery Officer from Incommunities overseeing a contract to develop houses

on a building site may require a good understanding of identifying indicators of modern slavery on construction sites. Whereas, an officer who orders food regularly on behalf of Incommunities may need to be aware that they should check the suppliers' website for the mandatory Modern Slavery Statement.

- Strive to identify parts of our supply chain which will involve a higher risk of modern slavery. Higher risk industries include construction labour, agriculture, food production, clothing/footwear manufacturing and mining. Where a higher risk supply chain is identified, decide proportionate steps to take to satisfy Incommunities that modern slavery is not present in the supply chain.
- Complete the steps before contracting and only enter into a supply chain contract if satisfied that reasonable steps have been taken which evidence that modern slavery is not present in the supply chain.
- Take steps to monitor on an ongoing basis to satisfy Incommunities that modern slavery is not present in the supply chain

5.3.1 Procuring Officers/Contract Manager

Monitor the supply chain for signs of modern slavery, for any supply chain contract (not just those identified as high risk). Monitoring that anti-slavery steps are being constantly taken by the supplier or contractor including, site visits and spot checks with hired labour – this list is not exhaustive. Contract managers should also be vigilant when on site in terms of the appearance of labour forces for evidence of modern slavery. Wage data may be taken into account though the limitations in respect of GDPR should be taken into account.

5.4 Front line staff

Our front line staff are expected to be vigilant for signs of criminal activity and/or safeguarding issues in our homes.

Officers dealing with housing applications will also be expected to be alert to the signs of slavery and the associated issues covered in this policy for example when interviewing potential customers as part of a 'suitability check'. Examples could be multi-occupancy/overcrowding, complaints or Anti-Social Behaviour, appearance etc.

5.5 Stakeholders and Partnerships

Incommunities is a member of both the Modern Day Slavery and Silver OCG Operational groups where we share information with partners and organise and participate in days of action where we attempt to break up and take action against these groups.

List of partners involved we work with to tackle MDS

- West Yorkshire Police (Chair)
- Hope for Justice
- West Yorkshire Fire and Rescue Service

- Immigration
- Adults and Children Safeguarding Team
- Childrens & Adults social care
- Trading Standards.
- NHS
- Bradford Council Domestic Abuse and Sexual Violence Team
- Child Exploitation Team social worker – Bradford.
- Lotus Project and Bridge- support services

6.0 Associated Documents

- 6.1 This policy is to operate alongside:
- Incommunities Procurement Policy
 - Incommunities Safeguarding Policy
 - Incommunities Modern Slavery Statement
 - Incommunities Whistleblowing Policy
 - Incommunities Allocation Policy

7.0 Performance Monitoring

- 7.1 The Director of Investment and Regeneration (until such time as a Procurement Officer is appointed who would then take up the role) and Director of Legal & Governance and the will produce a Modern Slavery Statement to be approved by the Board of Incommunities Ltd March each year. This will fulfil the requirements of section 54 of the Modern Slavery Act 2015. It will also act as a reporting mechanism to the Group Board on the efforts that have been made and will be made to counter modern slavery in our supply chain.
- 7.2 A Modern Slavery Steering Group will monitor intelligence and activity and inform the annual Modern Slavery Statement, and to ensure that relevant training, development and awareness raising have occurred.

8.0 Review

- 8.1 This policy will be reviewed every three years or sooner if regulation, legislation, or best practice determines.

Appendix 1: Contract Clause

As per section 4.1-4.2 of this policy, the following are suggested clauses to include in contracts with suppliers, aimed at tackling modern slavery.

COMPLIANCE WITH ANTI-SLAVERY AND HUMAN TRAFFICKING LAWS AND POLICIES

In performing its obligations under the agreement, the Supplier shall :

- comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force including but not limited to the Modern Slavery Act 2015 and
- have and maintain throughout the term of this agreement its own policies and procedures to ensure its compliance and
- not engage in any activity, practice or conduct that would constitute an offence under sections 1, 2 or 4, of the Modern Slavery Act 2015 if such activity, practice or conduct were carried out in the UK and
- include in its contracts with its subcontractors and suppliers anti-slavery and human trafficking provisions that are at least as onerous as those set out in this clause.

DUE DILIGENCE

The Supplier represents and warrants that at the date of this agreement:

- neither the Supplier nor any of its officers, employees or other persons associated with it has been convicted of any offence involving slavery and human trafficking;
- having made reasonable enquiries, and to the best of its knowledge, the Supplier nor any of its officers, employees or other persons associated with it has been or is the subject of any investigation, inquiry or enforcement proceedings by any governmental, administrative or regulatory body regarding any offence or alleged offence of or in connection with slavery and human trafficking.

COUNTRY-SPECIFIC CLAUSE

The Supplier undertakes not to purchase any products or services from [COUNTRY] that has been sourced from suppliers using forced labour in its operations.

SUBCONTRACTING

The Supplier shall not subcontract its obligations under this agreement without the prior written consent of the Customer. In order to help the Customer reach a decision on a proposed subcontract, the Supplier shall provide the Customer with a copy of any proposed subcontract, together with any other information that the Customer may reasonably require about the proposed subcontractor.

REPORTS

The Supplier shall notify the Customer as soon as it becomes aware of:

- Any breach, or potential breach, of the Anti-slavery Policy;
- Any actual or suspected slavery or human trafficking in a supply chain which has a connection with this agreement.

RECORD KEEPING AND AUDITS

The Supplier shall:

- maintain a complete set of records to trace the supply chain of all Goods and Services provided to the Customer in connection with this agreement; and
- permit the Customer and its third party representatives, on reasonable notice during normal business hours, but without notice in case of any reasonably suspected breach of this clause, to have access to and take copies of the Supplier's records and any other information and to meet with the Supplier's personnel to audit the Supplier's compliance with its obligations this clause; and
- implement annual audits of its compliance and its direct subcontractors' and suppliers' compliance with the Anti-slavery Policy, either directly or through a third party auditor. The first set of audits shall be completed by [DATE].

TRAINING

The Supplier shall implement a system of training for its employees, suppliers and subcontractors to ensure compliance with the Anti-slavery Policy.

The Supplier shall keep a record of all training offered and completed by its employees, suppliers and subcontractors to ensure compliance with the Anti-slavery Policy and shall make a copy of the record available to the Customer on request.

INDEMNITY

The Supplier shall indemnify the Customer against any losses, liabilities, damages, costs (including but not limited to legal fees) and expenses incurred by, or awarded against, the Customer as a result of any breach of Anti-slavery Policy.

WARRANTIES

The Supplier represents, warrants and undertakes that it conducts its business in a manner that is consistent with the Anti-slavery Policy.

TERMINATION

The Customer may terminate the agreement with immediate effect by giving written notice to the Supplier if the Supplier commits a breach of the following clauses:

COMPLIANCE WITH LAWS AND POLICIES CLAUSE

DUE DILIGENCE CLAUSE

COUNTRY SPECIFIC CLAUSE

SUBCONTRACTING CLAUSE

REPORTS CLAUSE

RECORD KEEPING AND AUDITS CLAUSE

TRAINING CLAUSE

WARRANTIES CLAUSE.