Sovereign Housing Association Limited

Modern Slavery Statement 2021-22

Our Business and Organisational Structure

Sovereign is a social business and one of the largest housing associations in the country. We have deep roots in the south of England, with almost 60,000 homes focused in a core area covering Berkshire, Hampshire, Oxfordshire, Gloucestershire, Dorset, Devon, Wiltshire, the West of England and the Isle of Wight. Sovereign Housing Association is a Registered Provider of Social Housing registered as a society under Cooperative and Community Benefit Societies Act 2014 with the Financial Conduct Authority (7448) and with the Regulator for Social Housing (4837).

This statement covers Sovereign and its subsidiary companies as listed below:

Sovereign Housing Design and Build Limited (Company Number: 06195779)
Sovereign Housing Developments Limited (Company Number: 07233624)
Sovereign Advances Limited (Company Number: 06927929)
Sovereign Housing Capital plc (Company Number: 06992513)
Sovereign Living Limited (FCA Registration Number: 26400R)
Sovereign Housing Partnerships Limited (Company Number: 07174978)
Spectrum Premier Homes Limited (Company Number: 2914932)
Spectrum Property Care Limited (Company Number: 8758536)

Our values:

Accountable
We take personal responsibility and are trusted to do the right thing.

Drive to deliver
We work with energy, enthusiasm and passion to get things done and we do what we say we will.

Together
We collaborate with colleagues, residents and partners so everybody benefits.

Adaptable
We embrace change, think ahead and find new ways of delivering a better customer experience

For more information about Sovereign Housing Association please go to our website www.sovereign.org.uk

Procurement and Supply Chains

Sovereign has an annual expenditure on goods, works and services of circa £325m across Sovereign and its subsidiary companies. The way we manage our procurement and supply chain is important to our financial viability, reputation and Environmental, Social and Governance (ESG) objectives. We recognise that good procurement and supplier relationship management practices can directly enhance our business performance by securing best value goods and services against favourable commercial and contractual terms.

Sovereign is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our supply chains include sourcing of goods, services and works for the delivery and maintenance of quality homes as well as corporate service requirements.

In line with Government guidance on the pre-qualification of suppliers in a tender process, our tender questionnaires are based on the Standard Selection Questionnaire, aligned with the UK Public Contract Regulations 2015.

Part 1 and Part 2 of the Standard Selection Questionnaire list the exclusion grounds that apply to public procurements above thresholds, and the statutory guidance states that the selection questions in Part 3 should be adopted across all procurement procedures and embedded as needed into procurement processes. As such Sovereign has adopted the standard Selection Questionnaire structure as a starting point to develop proportionate questions in the tender documents for lower value procurements.

Part 3 (Selection Questions) includes a section specifically on the Modern Slavery Act 2015 and a declaration to be completed by potential suppliers.

Where appropriate, the standardised pre-qualification questionnaire developed by the BSI for construction tendering (PAS91) is used in works contracts above the relevant regulatory thresholds, including a specific question to confirm bidders' commitments to ensuring that there is no modern slavery or human trafficking in Sovereign's supply chain.

Tender declarations are mirrored in our Supplier On-boarding process for new suppliers. This also addresses checks on low value suppliers that have been appointed in line with Financial Regulations.

From a contractual perspective, our terms include robust conditions in respect of Anti- Slavery, Labour Laws and onward contract management practises address the adherence to the standards required.

Policy Statement on Slavery and Human Trafficking

Sovereign is committed to Environmental, Social and Governance responsibility and has zero tolerance for slavery and human trafficking. We hold ourselves and our supply chain accountable and we fully comply with the provisions of the Modern Slavery Act 2015. Our supply chain is an extension of our business and our staff, as such we make sure that our values are reflected by all external suppliers working on our behalf and that they uphold the principles of our Equality, Diversity and Inclusion (EDI) Policy in all their dealings with our residents and customers.

We recognise that modern slavery can exist in a complex supply chain issue, and we work in partnership with our Customers, Suppliers, with local and national Government Organisations and agencies as well as other organisations to help develop long-term solutions to this issue.

We have rigorous Human Resources procedures in place to ensure that all employees have a legal right to work in the UK, are paid a fair and legal wage, and are under no duress.

Our social purpose and commitment to preventing slavery and human trafficking are also reflected in our Safeguarding and Procurement Policies, to underscore the seriousness of slavery and human trafficking and ensure that staff are aware of and responsive to the issues. We have an open accountable culture and if slavery and safeguarding issues emerge, these are reported through standard management processes, the Safeguarding Reporting process or through our Whistleblowing process.

Sovereign Housing Association and its subsidiaries will not support or deal with any business knowingly involved in slavery or human trafficking. The Board of Directors and all senior management take responsibility for implementing this policy statement and its objectives and provide adequate resources (training, etc.) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

In terms of oversight, procurement and compliance are reviewed by the Audit and Risk Committee of the Board regularly. This statement will be reviewed by the Board annually and published.

Supplier Adherence to our Values

Sovereign has zero tolerance to slavery and human trafficking and we expect all our supply chain, consultants and contractors comply with our values.

Sovereign Housing Association Limited is charitable

Training (L&D)

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our procurement and supply chains within our business, we continue to provide training to relevant members of staff.

We also continue to provide training to our frontline staff to help them identify potential cases of slavery and human trafficking and how to report them.

Future Action

During this financial year Sovereign Housing is mobilising projects to expand further the steps it takes to combat modern slavery and human trafficking as follows:

A robust Supplier Relationship Management framework and functionality (SRM) will be launched in FY 2022-23 across the business and our supply chain. In addition to periodic checks to ensure the Modern Slavery declaration is updated, we will work with suppliers to understand any supply chain pressures so as to deliver the most efficient, best value service for our customers and our business as a whole. The functionality and periodic reporting will ensure we are in a position to report on adherence KPI's across our supply chain both at an operational and commercial level. This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year ending 31st March 2022.

Date of Board Approval:

[8 September 2022]