Northampton Partnership Homes

MODERN SLAVERY STATEMENT 2022

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NORTHAMPTON PARTNERSHIP HOMES

Document Management Control

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MODERN SLAVERY STATEMENT 2022

The Modern Slavery Act 2015 (the Act) requires organisations supplying goods or services with a turnover of above £36 million to prepare and publish an annual Modern Slavery Statement.

Introduction

This statement sets out Northampton Partnership Homes' commitment to preventing slavery and human trafficking in all its business activities and within its supply chains. It outlines the steps we have taken to ensure compliance with the Modern Slavery Act 2015 (MSA) and minimise the risks of any association with practices which undermine the principles of safety and dignity for our customers and at work, particularly for people from vulnerable groups. It covers our current position on modern slavery and activities undertaken during the financial year 2021/22.

NPH STRUCTURE & VISION

NPH prides itself on providing homes in furtherance of our vision, which is: *provides homes which enable people to live happy and healthy lives in enriched communities.*

NPH is committed, as an employer to running our business responsibly. By creating more places to thrive, we will protect and enhance the communities we work for and with.

Our Mission is:

- We improve lives by sharing a common purpose
- We improve and maintain the quality of our homes
- We provide services which endeavour to meet the needs and aspirations of all tenants and residents
- People can influence immediate and long term futures for themselves and their communities

Our Values are:

- Open and Strong
- Listen and Respond
- Achieving more with others
- Aim High and Deliver

Organisation Structure, Business and Supply Chains

Northampton Partnership Homes (NPH) is an arms-length management organisation (ALMO) that manages West Northamptonshire Council's housing services.

NPH launched on 5 January 2015. NPH is a housing organisation wholly owned by West Northamptonshire Council operating as a Company Limited by Guarantee (CLG) and a not for profit organisation.

Northampton Partnership Homes is committed to:

- Responsibly managing our supply chain;
- Treating customers and suppliers fairly and with respect;
- Allying ethical procurement with value for money.

We will take steps to satisfy ourselves that our supply chains are satisfactory in terms of the requirements of both the modern slavery act (MSA), as well as meeting any formal requirements we set out for our suppliers.

Responsibility for compliance with the MSA rests at the highest level with our Board and across the whole Executive Management Team, with responsibility for the statement assigned to the Director of Human Resources and Organisational Development.

Our supply chain consists mainly of services rather than goods, with the highest risk areas being associated with our building and maintenance activity. We do not have any supply chain outside the United Kingdom.

We may come across slavery and/or human trafficking in connection with the vulnerable people we support, in particular those from minority or socially excluded groups who may be subject to forced labour and/or domestic servitude, and potentially in connection with our workforce. Accommodation managed by NPH could also be a potential venue for modern slavery.

Policies on Slavery and Human Trafficking

The MSA requires organisations to take steps to address modern slavery and human trafficking in their businesses and supply chains. As Northampton Partnership Homes has a turnover of over £50m, we are publishing this statement setting out what we have done to recognise and prevent potential incidences of modern slavery.

The most vulnerable groups in the UK include migrant workers, illegal migrants, asylum seekers and individuals, such as homeless people and people with learning difficulties. We are working on identifying how modern slavery and human trafficking may affect customers, our business and supply chains. This involves educating staff about the potential risks and capturing best practice in policies and procedures.

We continue to review our existing policies and procedures in light of the Act each year. We are confident that our policies promote good behaviour among our colleagues at work and within our supply chain. Our policies and procedures are kept under review to make sure that they reflect the company's evolution and our regulatory and statutory obligations. We have a number of policies and procedures in place that contribute to ensuring modern slavery does not occur in our business or supply chain which include:

- Code of Conduct;
- Dignity at Work Policy;
- Equality & Diversity Policy;
- Anti-Fraud & Bribery Policy;
- Health & Safety Policies
- Recruitment Policy;
- Wellbeing Framework;
- Whistleblowing Policy;
- Domestic Abuse and Safeguarding Policies;
- Financial Standing Orders.

Procurement

Our Procurement Policy is designed to ensure we operate in a legal, ethical and inclusive manner whilst achieving best value for money. This includes enabling our procurement activity to generate social and environmental, as well as commercial, benefits.

In our latest review we will include a statement on modern slavery, along with social value and sustainability.

Safeguarding

The Northampton Partnership Homes Safeguarding Policy includes reference to modern slavery as a type or pattern of behaviour which constitutes abuse of a person at risk; it also requires all Northampton Partnership Homes employees to complete training on safeguarding adults and children.

The MSA is available to all employees on the safeguarding pages of Northampton Partnership Homes' intranet, alongside the safeguarding policies and procedures.

People

Our People Strategy makes explicit reference to the MSA. The policy also emphasises that Northampton Partnership Homes is committed to dignity at work and fair treatment of all colleagues.

Recruitment

The Company's Recruitment and Selection Policy contains relevant requirements in terms of checking of eligibility to work in the UK and carrying out of necessary checks such as DBS (Disclosure and Barring Service) checks.

Due Diligence

We have taken time to understand the implications of the MSA and identify the areas within our business and supply chain where the greatest risks exist. These are:

- Procurement, and;
- Supporting vulnerable clients within Northampton Partnership Homes.

We have undertaken risk assessments in respect of these key areas and put measures in place to mitigate them. These include:

- Undertaking a review of our policy framework and instigating amendments to support compliance;
- Screening our procurement documentation to ensure that adequate safeguards are in place at each stage in the process i.e. soft market testing, pre-qualification questionnaires and formal tender. Our documentation already reflects our commitment to being a responsible business by incorporating requirements on social value;
- Ensuring both Northampton Partnership Homes and any preferred supplier employment agencies we use have the correct checks and balances within recruitment systems, such as eligibility to work in the UK and Disclosure and Barring Service (DBS);

- Our approach to training has been assessed. The services we provide around Care and Support has been an area of focus due to greater exposure to risk associated with vulnerable people.

Monitoring Effectiveness

Whilst a wider range of performance indicators will be considered in the future, the main method of monitoring effectiveness within the supply chain will be the pre-qualification criteria for suppliers, which includes a requirement to have measures in place to minimise the possibility of modern slavery in their business and supply chain.

NPH's Director of Human Resources and Organisational Development will periodically review the effectiveness of this policy

Training

Our Learning Management system includes an eLearning module which covers modern slavery and human trafficking.

Following completion, every Northampton Partnership Homes colleague will:

- Be able to explain the meaning of adult and child trafficking, human exploitation and modern slavery;
- Be aware of and make sure to respect the rights of victims of human trafficking;
- Act in line with their own responsibilities as a professional and be aware of the responsibilities of other authorities in the UK.

DECLARATION

This statement has been approved by NPH's Executive Management Team and by the Board of Directors and is made pursuant to section 54(1) of the Modern Slavery Act 2015.

Andrew Woods

Chair Northampton Partnership Homes

January 2022