

Bernicia's Slavery and Human Trafficking Statement September 2017

This statement is made pursuant to Part 6 Section 54 of the Modern Slavery Act 2015.

In the last 12 months -

- We have raised awareness about Modern Slavery by:
 - publishing our slavery and human trafficking statement externally.
 - updating our whistleblowing, adult safeguarding and equality and diversity policies to include references to modern slavery.
- The Procurement officer has completed and passed the training through the Chartered Institute of Procurement and Supply's 'Ethical Procurement and Supply' e-learning course.
- We have continued to include selection criteria in tenders which include the use of the Crown Commercial Service's standard pre-qualification questionnaire and PAS91 for construction procurement, which target questions of slavery and human trafficking risks.
- We have continued to hold information on suppliers, contractors and consultant's equal opportunity and diversity policies and statements.
- We have continued to ensure our staff have an understanding of the potential risks of modern slavery and human trafficking in delivering our services via Equality and Diversity and Safeguarding Training which includes making staff aware of the Modern Slavery Act 2015 which includes definitions of slavery and human trafficking and via Safeguarding Policies and Procedures.
- We have continued when recruiting new staff to ensure that all prospective employees are legally entitled to work in the UK via sight of an original document confirming this right prior to an offer of employment being made. A copy of the document or a detailed record of it is retained on file.
- We have continued to sign up new tenants using the following precautionary measures:
 - It is a condition of the tenancy agreement that tenanted' properties remain occupied by the legal tenant and are not used for "criminal, illegal or immoral activity", including slavery.
 - Photographs of new tenants are taken or obtained from the tenant so that identification can be confirmed at any time during the tenancy.
 - Unannounced or arranged calls are made at the commencement of new tenancies to ensure the right person is in the property.
 - Via Safeguarding training housing staff are made aware of the signs of criminal activity, including modern slavery so that if necessary action can be taken.

The Bernicia Group

We have adopted a 'one organisation' approach in our business operation enabling us to streamline the organisation and the Group into two divisions; Bernicia Homes and Bernicia Commercial.

Bernicia Homes – Owns and manages over 14,000 properties, and is developing new homes across a range of property types and tenures. We provide housing, care and support, services for single people, couples, families and older residents and those requiring additional support and assistance.

The Group's social housing assets are owned and managed by Wansbeck and Cheviot Homes, Three Rivers Housing and Berwick Borough Housing, all registered providers of social housing. Whilst legally distinct subsidiary companies we have integrated operational structures to allow consistent services to be delivered across all of our social housing activities, under the name Bernicia Homes.

Bernicia Commercial – There are three trading subsidiaries in the Group:-

Kingston Property Services & Avoca which provides property and block management, estate services and facilities management to the private residential and commercial sectors.

Livingspaces UK Limited which provides services and advice relating to property development, sales and the residential private rented sector.

The development of the Group has brought financial strength and given us the ability to invest in our staff, systems and services; both Bernicia Homes and Bernicia Commercial are high performing Group members and provide a solid foundation for future growth and development. We are a strong business well positioned to meet the challenges ahead.

Underpinning all that we do are our vision, mission and values.

Vision

Helping to create places where people want to live.

Mission

Our business supports this Vision by investing in neighbourhoods and communities and offering a wide range of homes and services that meet the requirements of our residents and customers.

Values



Customer Service
Building lasting customer relationships by focussing on customer needs and striving to exceed their expectations.



Teamwork
Creating dynamic, talented teams that work locally, communicate openly internally and externally, are passionate about and enjoy what they do.



Integrity
Building trust through open, honest, ethical behaviour, acting with respect for others, behaving as responsible members of local communities.



Quality
Maintain and enhance a reputation for quality, delivering services, and products that meet or exceed the quality standards demanded by customers and stakeholders.



Leadership
Leading by example, recognising the value of our employees, welcoming change, encouraging innovation, providing an environment of learning and development and creating value for our customers and stakeholders.

Modern Slavery Act 2015

The Modern Slavery Act 2015 aligns with Bernicia's integrity value on building trust through open, honest, ethical behaviour, acting with respect for others, behaving as responsible members of local communities.

Bernicia does not wish to support or deal with any business knowingly involved in slavery or human trafficking in any part of its operations.

Bernicia is committed to working with partners, contractors, suppliers and other stakeholders to understand the risks to the supply chain and implement systems and processes to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Bernicia manage procurements from a wide range of partners, suppliers and contractors via a varied supply chain including construction, repairs and maintenance, facilities management, building materials, office supplies, I.T services, recruitment, professional services, utilities, catering and cleaning.

Bernicia is aware that modern slavery and human trafficking is at risk throughout the supply chain and high risks for Bernicia which may exist are suppliers and service providers of repair and maintenance, recruitment agencies and construction contractors.

Over the next 12 months, to gain a further understanding of high risk areas, provide more clarity in our processes and mitigate risks, Bernicia will endeavor to take positive action and undertake the following:

- Complete the implementation of changes to procurement documents to include reference to modern slavery and human trafficking including procurement policy, terms and conditions, code of practice for contractors.
- Complete the review of our existing supplier and contractor list to include an evaluation of their compliance with the Modern Slavery Act.
- Write to suppliers and contractors in potentially higher risk categories to check what assurance arrangements they have in place.
- As part of the prevention with suppliers and contractors we will request all existing and new suppliers and contractors to sign a statutory declaration conveying their understanding of the organisations approach to modern slavery in the supply chain.
- Communicate Bernicia's standards to our contractors, stakeholders and suppliers, who will be expected to maintain the same standards.
- Implement procedure and process for non-compliance of the act.

Appendix 1

- Communicate to, residents and leaseholders to make them aware of the Modern Slavery Act 2015, including the definitions of slavery and human trafficking.
 - Residents will be made aware of the Modern Slavery Act via articles on our Website and in tenants' newsletters.
 - Leaseholders will be made aware by inclusion of information in guides or with invoices.
- Continue to review other internal policies where reference to the modern slavery act is required.
- Contact our current suppliers who provide us with temporary staff to ensure they also comply with this Act.
- Complete an update of the e-learning course (Procurement Officer). (Review every 12 months).

The Executive Director of Finance and Corporate Services will take lead responsibility for the development and implementation of anti-slavery initiatives.

This statement has been approved by the Bernicia Board and will be reviewed and updated annually.