

## **St Leger Homes of Doncaster Limited : Modern Slavery statement 2017**

### **Introduction**

This statement sets out St Leger Homes of Doncaster Limited's activities to understand all potential modern slavery risks and actions aimed at ensuring that there is no slavery or human trafficking in St Leger Homes or our supply chains. This is St Leger Homes' second modern slavery statement and relates to the financial year 1 April 2016 to 31st March 2017.

### **Company statement**

St Leger Homes has a zero-tolerance approach to modern slavery.

Our commitment to all aspects of equality and diversity is inherent in our mission, vision, values and strategic objectives.

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within St Leger Homes or in our supply chains.

We are also committed to ensuring there is transparency in St Leger Homes and in our approach to tackling modern slavery throughout our supply chains, and we demand the same high standards from all of our contractors, suppliers and business partners.

### **Company structure, activities and supply chains**

St Leger is an Arm's Length Management Organisation (ALMO) managing Doncaster Metropolitan Borough Council's (DMBC) 20,300 homes and other assets. We provide affordable, rented accommodation efficiently and provide our customers with the highest standards of service.

St Leger Homes employs over 750 people in a wide range of service areas including housing management and support, property repairs, improvements and technical services, HR, Finance, IT and administration.

Direct expenditure totals nearly £60m to deliver St Leger Homes' day to day housing management and property repairs services, and, on behalf of DMBC in delivering their capital programme, home and estate improvements.

### **Company policies and procedures**

We have an extensive framework of policies and procedures that are reviewed and updated periodically and monitored by the Business Assurance Team to ensure this is completed and that best practice is adopted.

Notable strategies, policies and procedures, among others, that consider our approach to preventing slavery and human trafficking in our operations include:

- Protected Disclosure (Whistleblowing);
- Employee Code of Conduct;
- Equality & Diversity;
- Customer care;
- Vulnerable persons;

- Procurement Strategy;
- Financial Regulations and Contract Standing Orders;
- Recruitment and Selection;
- Anti-Fraud, Corruption and Bribery;
- Dignity at work;
- Equality Strategy

Further information can be found on [www.stlegerhomes.co.uk](http://www.stlegerhomes.co.uk)

More specifically, the Safeguarding policy includes specific guidance for staff on how to recognise signs of abuse, including modern slavery, as a type or pattern of behaviour which constitutes abuse of a person at risk, among our customers and employees, and also how to respond to and escalate any concerns.

### Tenants

For our tenants, we undertake a number of operational activities where possible signs could be viewed. These include:

- programmed tenancy audits of our properties;
- financial inclusion / welfare reform support;
- neighbourhood management, local offices and patch workers resulting in our officers knowing a large number of tenants,
- strong working relationships with the Tenant and Resident Associations (TARAs);
- a St Leger fraud hotline;
- Community Caretaker Services reporting any illegal or unusual practices;
- tenancy sign up procedures covers the clauses in the updated Tenancy Agreement. periodic estate inspections where we might notice anything indicating modern slavery, and residents can attend and often report issues;
- tenancy verification visits on some estates;
- direct links between the gas service team and estates teams to report any concerns.

### Supply chain

At any one time, St Leger Homes has over 80 contracts in place.

Our Financial Regulations and Contract Standing Orders and Procurement Strategy ensure we operate in a legal, ethical and inclusive manner whilst achieving best value for money.

Our dedicated Procurement team utilise Official Journal of the European Union (OJEU) compliant frameworks operated by procurement consortia and St Leger Homes has representatives on the boards or working groups of a number of consortia, which enables robust benchmarking and sharing of best practice.

In addition, we have developed an Equality and Diversity (E&D) scheme for all our main and subcontractors, in which we award them a gold, silver or bronze standard, dependant on their approach to E&D. We will work with those being awarded silver and bronze to help them achieve gold standard.

Specifically within our E&D policy we state that we will only employ contractors once we are satisfied that they have appropriate E&D policies that align with ours. We will work with our contractors to ensure they sign up to our voluntary E&D Contracts standard. This has been formulated to provide existing contractors with a baseline position based on their current strategies, policies and practices.

To ensure compliance with our values and ethics, we have in place rigorous selection, due diligence and tender processes which includes checks on financial standing, convictions, and health and safety, among others, to help ensure our suppliers and their supply chains are slavery free.

All contracts have a specific E&D Terms and Conditions section and, going forward, specific references to modern slavery will be included in all new contracts as they are awarded or renewed.

St Leger Homes recognises our social responsibility and where possible target contracts that will utilise local labour. Contracts also include 'back to back' clauses whereby contractors use the same terms and conditions if any work is subcontracted down the supply chain.

We check explicit slavery issues when we review other areas such as price increases, performance and E&D commitments, as part of our established contract management arrangements.

If any of this work identifies risks of modern slavery, this could result in termination of the supplier's contract. Concerns will be reported to the Modern Slavery Helpline as appropriate.

### **Due diligence**

St Leger Homes undertakes extensive due diligence on employees, tenants and suppliers as part of everyday operations.

#### Employees

Our Recruitment and Selection Policy contains relevant requirements in terms of checking of eligibility (Right to Work checks that meet Home Office guidance) to work in the UK and carrying out of necessary checks such as DBS on relevant employees

References are requested on all employees, and this includes asking referees for any concerns about the applicant working with vulnerable people or children.

St Leger Homes has a contract in place with a temporary staff provider to ensure core services are maintained if employee posts become vacant. The provider has been procured in accordance with all supplier contract award requirements (see below).

#### Tenants

Robust tenancy verification checks are in place for sign ups, plus further verification visits on some estates. Our Tenancy Agreement was updated in 2016/17 and now includes reference to the Modern Slavery Act.

#### Suppliers

As referred to above, all suppliers, as part of our tender procedures, must complete a self-assessment Pre-Qualification Questionnaire, which includes questions around Equality and Diversity. Suppliers must provide evidence to support their responses.

### **Risk areas**

St Leger Homes operate a wide number of activities in delivering housing management and property maintenance services. These services require a large number of employees and contractors to social housing tenants. Therefore, there are a number of risk areas to

consider, but the main areas identified as the greatest risks exist are in procurement and vulnerable tenants.

St Leger Homes operate a risk management framework to mitigate all strategic and operational risks and the policies and procedures and the due diligence listed above, and the training referred to below, mitigates these risks.

## Training

St Leger Homes has structured induction and training programmes which are updated periodically.

Modern slavery was increasingly referenced in the training during 2016/17 and tailored, specific training will be given in early 2018. Training delivered in 2016/17 that referenced modern slavery included:

- All new employees undergo a corporate induction and as part of this receive an Employee Code of Conduct which they must sign to confirm receipt, and receive a safeguarding briefing session. The Code of Conduct will be updated and re-launched in April 18;
- All new staff are also required to attend a separate training session on safeguarding adults and children;
- Recruitment and selection training is provided to employees and includes right to work checks and the importance of pre-employment checks;
- Dignity at work for line managers (bullying, harassment);
- Fraud and money laundering.

For apprentices, the employee code of conduct is emphasised and the roles of trade unions and first contact officers should they ever see or feel anything that makes them uncomfortable or that something is not right.

'Digital first' is a strategic objective of St Leger Homes and this will include all training, making best use of an e-learning module for safeguarding and related subjects. The module used in 2016/17 will be developed further in 2017/18.

In addition to the above, a briefing providing background information and advice for staff on what to do if they suspect that slavery, human trafficking, etc. takes place, and also providing guidance on the selection of suppliers, will be published in Staff Focus, our employee newsletter, and posted on our intranet.

## Signing

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and is St Leger's slavery and human trafficking statement for the financial year ending 31st March 2017.

Signed by:



Paul Tanney, Chief Executive