



Your Homes
Newcastle

Your Homes Newcastle (YHN)

Slavery and Human Trafficking Statement

Financial Year Report - 2019 / 2020

Introduction

Your Homes Newcastle ("the Company") is a not-for-profit, Arms-Length, Management Organisation (ALMO) and a wholly owned subsidiary of Newcastle City Council. We were set up in 2004 to manage the Council's properties, to improve housing in order to meet the Government's Decent Homes standard and, to provide a range of support services for Newcastle City Council and other landlords. We currently manage:-

- 25,141 council and leasehold homes on behalf of Newcastle City Council; and
- 752 homes on behalf of Leazes Homes.

Our Structure, Business and Supply Chains

We have a group structure with Your Homes Newcastle as the parent company along with two subsidiaries. The two subsidiaries are Asfaleia Limited (a charitable subsidiary), and Abri Trading Limited, (a trading subsidiary).

- Your Homes Newcastle provides our core housing management and administrative functions;
- Asfaleia Limited delivers our community care alarm service, sheltered housing service, young peoples' service, advice and support service and, employability services; and
- Abri Trading Limited includes the Newcastle Furniture Service (NFS) and, Palatine Beds.

Further information about our activities is detailed on our web site at

<http://www.yhn.org.uk/>

Our tier one supply chain is made up of UK / European-based Suppliers. Total buying value in 2019 / 2020 for the Group was £8.45m across 327 Suppliers with the top 8% (25) of Suppliers accounting for almost 74% (£6.236m) of expenditure. The main categories are summarised below: -

White goods, small electrical and furniture items for NFS	£2.61m (30.94%)
Information technology and telephony	£1.41m (16.72%)
Palatine Beds (Raw Materials)	£1.81m (21.39%)
Healthcare Services	£0.26m (3.08%)
Utilities	£0.12m (1.37%)
Printing	£0.20m (2.31%)
Miscellaneous Other	<u>£2.04m (24.19%)</u>
TOTAL	<u>£8.45m (100%)</u>

Policies in Relation to Slavery and Human Trafficking

YHN has a zero-tolerance approach to any form of modern slavery and trafficking. This is supported by our Modern Slavery Policy that was developed and implemented during 2016 / 2017. As well as setting out our approach, the Policy details how it will be communicated and how we will ensure compliance, as well as deal with any breaches.

During 2018, we agreed that Your Homes Newcastle would align their Procurement Procedure Rules to Newcastle City Council's and, we have been working with the Council to replace our Corporate Procurement Strategy with a new Commissioning and Procurement Plan which can be found on our external website.

The new Plan is supported by a number of Policies including Anti-Bribery, Fraud and Corruption, Whistle-Blowing and Corporate Equality, as part of our Public Sector equality duty which includes the elimination of unlawful discrimination.

During 2019 / 2020, a Modern Slavery Policy and Concept of Operations document was developed by Newcastle City Council but, which can be utilised by YHN. This was implemented in September 2019 and is a document which YHN can refer to for guidance, although it specifically relates to Newcastle City Council. YHN would follow this when entering / managing a Contract on behalf of the Council but, we would retain our own Policy for YHN Contracts.

YHN are also committed to continually assess the recruitment procedures and practices in order to comply with current employment legislation and, recruit staff according to best practice. During 2016 / 2017 we updated our Employee Code of Conduct and Whistleblowing Policies to include reference to Modern Slavery. Equality impact assessments are also carried out on all HR-related Policies to ensure they promote equality of opportunity.

YHN are aware of the updated Government guidance on Covid-19 for Modern Slavery and have acted on these where appropriate; particularly around Health and Safety of Workers, Supporting Suppliers (through relief payments) and, Emerging Risks, in terms of updated risk assessments.

Due Diligence Processes in Relation to Slavery and Human Trafficking in our Business and Supply Chains

As a group we are governed by the Public Contract Regulations 2015 (as amended), which are underpinned by our Financial Regulations. As part of our commissioning and procurement activity, Suppliers are assessed for their suitability to perform the Contract specification using a Supplier Selection Questionnaire (SQ), which incorporates requirements for Modern Slavery checks relating to a Supplier's economic and financial standing, as well as compliance with Labour Law. In addition, our standard Contract terms require our Suppliers to adhere to all of our Policies and Rules, together with compliance at all times with the Law, including specifically the Modern Slavery Act, in the performance of the Contract.

Parts of our Business where there is a risk of Slavery and Human Trafficking taking place, and the steps we have taken to assess and manage that risk.

We have analysed our third party spend and categorised the supply areas we think are most at risk of modern slavery. The areas we think that are most at risk are due to their relatively high level of spend and the lack of supply chain visibility below our tier one Suppliers: -

- Supplies of white goods, small electrical and furniture items, for NFS.
- Supplies of raw materials to manufacture beds, forPalatine.

During 2016 / 2017 we undertook the mapping of our NFS supply chain, securing the signed commitment to tackle Modern Slavery and action plan from our first-tier Supplier. They in tum secured the same commitment from the majority of our second-tier Suppliers. Going forward we continue to pursue any outstanding commitments and plan to undertake a similar exercise for the raw material Suppliers to Palatine Beds.

Effectiveness in ensuring that slavery and human trafficking is not taking place in our business or supply chains

We are confident that slavery and human trafficking is not taking place amongst our first-tier Suppliers due to the due diligence processes that we currently have in place. Whilst we cannot be as certain that slavery and human trafficking is not taking place further down our Supply Chains, since the introduction of our new Policy and revised procedures, together with the work we have undertaken in conjunction with our NFS supply chain, we have had no reported instances of Modern Slavery.

Training about slavery and human trafficking available to staff

Since 2016/17, Modern Slavery training has been incorporated into our Safeguarding Adults and Children Level 1 and Level 2 training, which is mandatory for all staff who may have to make a safeguarding alert. In addition, Supplier guidance in relation to Modern Slavery has also been developed and made available on our website.

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved and published by the YHN Board and, will be reviewed annually.

Signed:



Position: Chairman

Date: 30.07.2020