

Modern Slavery Act Statement

bpha is a major housing association operating between Oxford and Cambridge, based in Bedford. We are a leading provider and developer of affordable homes – for rent, sheltered, residential care, shared ownership and sale. We own around 18,000 homes, employ around 400 people and have an annual turnover in excess of £115 million.

- Our service is delivered principally through bpha Limited, a registered provider of social housing. This statement is made by bpha limited as group parent on behalf of the bpha group. Those of our subsidiaries that are required to make their own statement under the Act have adopted this statement:
- **CPLhomes Management Services Limited** is 100% owned by bpha, and provides housing management services tenants of social housing providers.
- **Bushmead Homes Limited** is 100% owned by bpha, and develops properties for outright sale.
- **Gog Magog Partnership LLP** develops residential accommodation for sale. bpha has a 25% interest in the Partnership (via Bushmead Homes Limited).
- **The Oxfordshire Care Partnership** and **The Gloucestershire Care Partnership** are both joint ventures providing elderly persons care. bpha has a 50% stake in each Partnership
- **Cambridgeshire Partnerships Limited** is now dormant, but bpha has a 25% stake in the company.

More details of our company structure can be found in our [financial statements](#).

This statement is made in accordance with the provisions of section 54 of the Modern Slavery Act (“the Act”) which requires that all organisations with a group turnover of £36 million or more prepare and publish a statement setting out the steps that they have taken during the financial year to ensure that slavery and human trafficking are not taking place in any part of their own business or anywhere in their supply chain. This statement applies to the financial year ending 31 March 2019.

Our policies on slavery and human trafficking

We have reviewed our existing policies and procedures in the light of the Act. We are committed to doing the right thing, valuing people and ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business and we are confident that our current policies promote ethical behaviour and integrity both within our business and within our supply chain.

In our own business

As part of our initiative to promote integrity and ethical practices within our business we have a number of internal policies and procedures.

We operate a robust recruitment process, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

We operate a Tenancy Fraud Policy to prevent address and identify housing fraud. As part of this policy we require photographic identification at the time of application for housing which is then verified when the applicant signs their tenancy agreement and can also be used during routine home visits to identify and verify the occupants of the property.

As a social landlord bpha has a duty to keep at risk and vulnerable residents safe from abuse. In accordance with our Adult and Child Safeguarding Policies, bpha is committed to responding appropriately to abuse and neglect by:

- Addressing safeguarding concerns promptly and efficiently.
- Working in partnership with agencies that have a statutory responsibility or non-statutory involvement with children and adults at risk.
- Raising awareness among employees about abuse and neglect through compulsory training, briefings and tools such as checklists.
- Raising awareness amongst employees about potential issues of modern slavery at development sites through safeguarding training and Home Office guidance.
- Developing a culture that does not tolerate abuse and encourages people to raise and/or address concerns in a prompt and proportionate manner.
- Preventing abuse happening where possible by making appropriate and timely referrals.
- Recognising signs of exploitation and grooming and responding appropriately.

We have an on-going, regularly updated, training programme for all relevant staff in relation to safeguarding issues.

bpha encourages all individuals to raise any concerns that they may have about the conduct of others in the organisation or the way in which bpha is run through its Whistleblowing Policy.

In our supply chain

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a system of screening potential suppliers which requires our suppliers to certify compliance with the Act.

Our supplier screening process is incorporated within our Suitability Assessment documents which are issued to prospective suppliers as part of any new procurement process. We have a revised supplier onboarding process, including signed declarations of compliance with the Modern Slavery Act to be signed by each supplier. New procurement procedures also make a commitment to conducting regular supplier reviews through the bpha supply chain, to ensure we achieve full compliance with our obligations to conduct such checks.

The questions asked of suppliers will be based on the procurement guidance published by Crown Commercial Services, which bpha are obligated to use on any new procurement procedure that requires compliance with EU laws. We use the same questions on any suitability assessment conducted for procurements below EU tendering thresholds, to ensure consistency in approach.

We also include a Modern Slavery statement within the schedule of amendments to all of our suppliers' contracts and our services contracts.

We ask Suppliers to confirm that they have processes in place to check that any of their own suppliers (Sub-Contractors) have appropriate policies and procedures in place to seek to ensure the suitability of their own supply chain.

Training

All employees carry out training on the modern slavery act as part of the induction process, we also run more extensive safeguarding training, targeted at relevant employees.

We have discussed the Act and its purpose within the organisation's senior management team to promote awareness of the Act and the need for continuing action in this area.

Further steps

Following a review of the effectiveness of the steps we **have taken to ensure** that there is no slavery or human trafficking in our supply chain or our business we intend to take the following further steps to combat slavery and human trafficking:

- Continue to review our existing policies and procedures in the light of the requirements of the Act.
- Work towards the implementation of a new procurement system to aid in the carrying out of appropriate checks and balances.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes bpha's slavery and human trafficking statement for the financial year ending 31 March 2019 and was approved by the Board of bpha Limited on 19 September 2019.

A handwritten signature in black ink that reads "Paul Leinster". The signature is written in a cursive, flowing style.

Professor Paul Leinster

Chair of the Board

bpha Limited

Date: 19 September 2019