

bpha Modern Slavery 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 19,464 homes, employ over 480 people and have an annual turnover in excess of £110 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:
- **bpha Finance Plc** is 100% owned by bpha, and is a Public Limited Company which is a special purpose vehicle for issuing bonds.
- **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
- bpha has a 25% stake in **Cambridgeshire Partnerships Limited** which is no longer trading and is subject to a dissolution process.
- **DOMOVO** is a brand name used by bpha Ltd. DOMOVO offers an estate agency service supporting the need for affordable housing.

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 2021.

Our policies on slavery and human trafficking

We continue to review 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.

Policies are approved by senior management, available to workers in our organisation and communicated to them.

In our own business

bpha Limited is a Registered Society under the Co-Operative and Community Benefit Societies Act 2014 and also with the Regulator of Social Housing and is affiliated to the National Housing Federation.

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 transparent and 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.

Victims of modern slavery are unable to leave their situation of exploitation, controlled by threats, violence, coercion and deception and often unable to recognise they are being abused and/or exploited, echoing similarities to domestic abuse. bpha recognises this link and has gained DAHA accreditation due to our improved services for victims and survivors of domestic abuse. We continue to review the organisation's approach to domestic abuse; ensuring all colleagues are trained and aware of the signs and where to appropriately signpost. We have reviewed how existing cases of domestic abuse are dealt with internally and developed a new approach to working with victims and survivors, ensuring that residents and employees are able to access support information easily when it's required. We work closely with partner agencies to ensure that we provide an improved service for all. With improved awareness, bespoke training, auditing of cases and listening to our customers views and feedback, the

signs of domestic abuse and modern slavery should be more easily recognised, helping us to work with partner agencies to support customers in these situations.

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.

During the Covid 19 pandemic all our customers were contacted by survey to ask if they were feeling vulnerable and/or required support, we contacted all those who responded by phone to offer direct assistance. We also contacted customers previously identified as needing support. We created a directory for staff to signpost residents to resources and support services that were local to them.

In our supply chain

As a UK based organisation in a highly regulated sector, our purchasing is not primarily cost driven; we aim to use established businesses with appropriately qualified and checked contractors. 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 Modern Slavery Act.

Our suitability assessments for suppliers check that all relevant commercial organisations (as defined by section 54 of the Modern Slavery Act 2015) are compliant with the Act's annual reporting requirements. We ask prospective companies to confirm that their company has policies and procedures that meet the principle requirements of this Act, and that they have processes in place to check that any of their own suppliers have appropriate policies and procedures in place to ensure the suitability of their own supply chain."

No incidences of modern slavery have been recorded or uncovered within our organisation or supply chains in the past 12 months.

This year we have written to the top 100 suppliers appointed under contract, asking them to confirm that they have Modern Slavery Act 2015 compliant policies and procedures.

Training

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

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

Our Home Team have also received training from Bedfordshire police to recognise the signs of modern slavery.

After the Covid 19 lockdown we rolled out safeguarding training specifically for call handlers covering picking up on signals of distress and understanding how to have conversations safely, risk assess them and pass onto the relevant team to progress.

We have discussed the Modern Slavery Act 2015 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.

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 'Speaking Up Whistleblowing Policy and Process'. Suspected incidences of modern slavery can be reported in this way.

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:

- We plan to refresh our online training offer over the next year and this will become mandatory for new staff in relevant roles. We will also be introducing additional classroom training for colleagues in specific front-line and support service roles.
- All employees will be required to confirm that they have read and understood our 2021 Modern Slavery Statement.
- We will continue to review our existing policies and procedures in the light of the requirements of the Act.

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 2021 and was approved by the Board of bpha Limited on 21 September 2021.



Professor Paul Leinster

Chair of the Board bpha Limited

Date: 21 September 2021