

MODERN SLAVERY STATEMENT 2022

1 INTRODUCTION

Slavery and Human Trafficking remains a hidden blight within society. The Havebury Housing Partnership ('Havebury') as a socially responsible business, has a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

- 1.2 Employees are expected to report any concerns, and Management and the Board are expected to act upon them to ensure that Slavery and Human Trafficking is not taking place within Havebury and its supply chain.
- 1.3 Havebury is a specialist provider of affordable and social housing and provides a comprehensive range of services and maintenance for over 6,900 homes predominantly in West Suffolk, extending to the surrounding East Anglia region. Havebury has an annual turnover in excess of £40 million and employs over 200 members of staff.

2 ORGANISATION'S STRUCTURE

Havebury is a charitable registered society under the Co-operative and Community Benefit Societies Act 2014 (7648) and is regulated by the Regulator of Social Housing (LH4339). Havebury's registered office address is Havebury House, Western Way, Bury St Edmunds, Suffolk, IP33 3SP.

- 2.1 Havebury has two wholly owned property services and development subsidiaries operating within the East Anglia Region - Design & Build Services East Ltd, which is currently dormant but specialises in the procurement of building and development services and Havebury Homes Ltd, which develops properties for market sale.

3 OUR SUPPLY CHAINS

Havebury does not currently trade directly outside the UK and wherever possible procures labour and materials within the local community. Our supply chains include construction, building maintenance, heating and kitchen installation, property cleaning and maintenance services and purchasing of ICT and office equipment principally related to the management, maintenance and provision of social and affordable housing. We also work with specialist providers who provide care and support services to our residents.

4 DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

- 4.1 To ensure a high level of understanding of the risks of Modern Slavery and Human Trafficking in our supply chain and our business, Havebury will provide awareness training to members of staff. The following actions have been taken by Havebury:
 - Leadership Team have reviewed the Contract Register to identify and monitor particularly high-risk contracts
 - Modern Slavery has been considered during Policy reviews and amendments have been made to Safeguarding Policies and Protection from Harassment Policies
 - People policies and procedures ensure that all employees have a legal right to work in the UK, are paid a fair and legal wage, and have a safe working

environment. All staff are treated equally and proportionately in any disciplinary procedure

- In relation to new suppliers, for any tenders for contracts above the Public Contract Regulations (PCR) threshold and any from £50,000 up to PCR threshold, compliance with the Modern Slavery Act has been included within the selection process, specifically within the Supplier Suitability Assessment, and any failure to meet this will lead to disqualification of the applicant. Havebury only accept tenders from contractors that comply with the requirements of the Modern Slavery Act. For any purchase below £50,000 where a Request for Quotation (RFQ) is issued the RFQ clearly states that a condition of a quote being submitted is the supplier accepting that they comply with the requirements of the Modern Slavery Act.
- Following the implementation of the Supplier Suitability Assessment data collated from Contract Review meeting reports is be used to monitor the effectiveness of processes in ensuring the absence of Slavery and Human Trafficking in any part of our business or supply chain.

- 4.2 Havebury's Management Charter promotes open and transparent communications between managers and staff. Havebury also has policies such as Whistleblowing Policy under which employees can raise concerns including those relating to Modern Slavery.
- 4.3 Any non-compliance discovered will be dealt with on a case-by-case basis, and where appropriate the relevant authorities will be notified.
- 4.4 Our contracts will include specific clauses in relation to Modern Slavery and contractors will be legally bound to certify that they in turn conduct due diligence on their supply chains.