

MODERN SLAVERY STATEMENT 2024

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 7,500 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 250 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 predominantly trades within the UK, with only four suppliers of IT solutions being based outside of 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 are undertaken by Havebury:

- The Contract Register is reviewed and monitored by Contract Managers, Procurement and the Leadership Team to identify high-risk contracts.
- Modern Slavery is considered during policy reviews and relevant amendments are 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.

- An Ethical Business Policy has been implemented, which includes standards of employment complying with the UK Modern Slavery Act as well as the Ethical Trading Initiative (ETI) base code.
 - Compliance with the Modern Slavery Act is included within new supplier selection processes or the supplier onboarding process, specifically within the Supplier Suitability Assessment, and any failure to meet this will lead to disqualification of the applicant.
 - All new suppliers, as part of the onboarding process, are required to read and agree to abide to the principles and terms within our Ethical Business Policy.
 - 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.
 - Data collated from contract review meeting reports is be used to help 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 promotes open and transparent communications between managers and staff. Havebury also has policies such as a 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.

**SIGNED by Andrew Smith, Chief Executive,
with delegated authority for and on behalf
of Havebury Housing Partnership**

Signed copy available on request

DATED

30 November 2023