

## Modern Slavery Statement

This statement has been published in accordance with the Modern Slavery Act 2015 s54 and sets out the steps taken by Karbon Homes to prevent modern slavery and human trafficking in our business and supply chains for the financial year ending March 2019.

### Introduction

Modern slavery and human trafficking is an issue that exists in both developed and developing economies and across business sectors. Karbon has a zero tolerance approach to slavery, servitude, forced labour and human trafficking (modern slavery), and is committed to conducting business with honesty, integrity and treating everyone with dignity and respect. Our existing policies, processes and contracts show that we embrace the principles and aims of the Modern Slavery Act 2015.

We are committed to working with our partners and suppliers to raise awareness and understanding of modern slavery and eliminating the practice from the supply chain. This statement details the actions we have taken this financial year to achieve this.

### Structure and supply chains

Karbon provides homes and services which form the foundations for people and places to fulfil their potential. As a housing association, we own or manage almost 30,000 properties across the North East of England and Yorkshire and develop more homes every year. We provide social rented, affordable, specialised, shared ownership and market rented homes, and also develop shared ownership and market sale homes to meet our customers' aspirations.

The Karbon Homes Group encompasses Karbon Homes as the parent, York Housing Association, Enterprise Durham Partnership, Prince Bishop Homes, Karbon Developments, Karbon Solutions, Next Level Developments and Cestria Services.

The key areas of our operation that could be affected by slavery and human trafficking are directly hired employees, agency workers and the workforce of our supply chain who supply materials and services to our business.

In order for organisations to become a supplier, contractor or service provider for any contracts over £100,000 they must complete a Standard Selection Questionnaire and are required to demonstrate compliance with the Modern Slavery Act 2015 where relevant. If a supplier, contractor or service provider is unable to provide evidence of compliance they will not progress any further in the procurement process. If at any time instances of modern slavery come to light with a current supplier, contractor or service provider, depending on the severity of the findings, we would either work with them to put an action plan in place to resolve the issue or we may terminate the contract immediately. *For 2019/20, we will explore the potential for additional controls for contracts below £100,000.*

## **Policies on modern slavery**

We have a robust governance structure which oversees the development and implementation of policies that discuss our commitment to tackling modern slavery; a number of them have been reviewed this financial year. These include our suite of probity documents (Anti Fraud and Anti Corruption, Anti Money Laundering, Gifts and Hospitality and Whistleblowing policies), Procurement Strategy, plus our Contractor Code of Conduct.

We also have robust People and Organisational Development policies and procedures in place and an employee Code of Conduct to ensure the fair treatment of all colleagues. We comply with all applicable employment legislation relating to employee terms and conditions, including payroll, the use of agency employees and we invest in supporting the health and wellbeing of our staff.

Our Safeguarding Adults and Children Policy includes specific reference to modern slavery and how to respond to and escalate any concerns.

The recently reviewed Tenancy Fraud and Allocations & Lettings policies are clear that staff must take appropriate action to ensure that customers living in our homes 'are who they say they are'.

## **Due Diligence processes**

Karbon is committed to eradicating modern slavery and human trafficking in all areas of the business and supply chain.

As part of our existing procurement process, we undertake an assessment of new suppliers which includes criteria on ethical and sustainability issues, including labour rights and modern slavery.

We expect all those in our supply chain and contractors to comply with our values.

## **Risk Assessment**

There are a number of ways we assess and manage the risk of modern slavery in our own operations. We have policies and processes in place to avoid the risk of modern slavery among the colleagues we employ directly, and our People, plus Procurement functions are working together to minimise the risk of modern slavery among colleagues who are not directly employed by us.

Karbon encourages its employees and suppliers (where permitted by law) to report certain matters confidentially or anonymously without fear of retaliation, including circumstances that may give rise to slavery or human trafficking concerns (please refer to our recently updated Whistleblowing, Safeguarding, ASB and Domestic Abuse policies).

### Measuring effectiveness

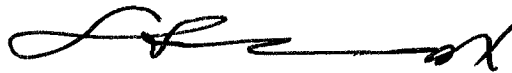
We will continue to use performance indicators to measure how successful we have been in ensuring that modern slavery is not taking place in any part of our business or supply chains. Performance indicators include the delivery of mandatory training for employees engaged in recruitment and procurement activities; the updating of supplier contracts to reflect obligations for Modern Slavery Act compliance.

### Training for staff

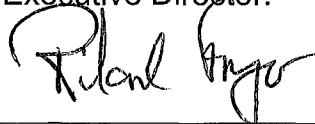
We provide advice and guidance to those teams who have direct responsibility for relevant supply chains, plus our 'customer facing' teams who regularly enter homes to ensure a high level of understanding of the risks of modern slavery. For example, we provide essential safeguarding guidance which covers how to spot the signs and indicators of modern slavery.

This statement has been published pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Karbon's slavery and human trafficking statement for the financial year 2018/2019. It has been approved by the Board of Directors and will be reviewed annually.

Signed for and on behalf of the Group Board.



Signature of Executive Director:



Date:

25/3/19.