

Appendix 5

Swan Housing Association Group Anti-Slavery and Human Trafficking Statement Year ended 31 March 2020

Introduction

Swan Housing Association and its subsidiaries ('Swan') together 'the Group' are committed to:

- Undertaking and promoting ethical practices and policies to prevent modern slavery and human trafficking (Modern Slavery);
- Ensuring its personnel and assets are not involved or exploited for the benefit of those involved in such activities; and
- Providing a full statement as required under the transparency provisions of the Modern Slavery Act 2015.

Organisational Structure

Swan Housing Association, as Parent of the Group, is a charitable housing association and registered society under the Co-operative and Community Benefit Societies Act 2014, owning and managing over 11,000 homes. Our mission is to deliver effective services, enterprising solutions and exemplary homes and communities in East London and Essex. Our principal subsidiaries Swan New Homes Ltd (trading as NU Living) (residential development), Vivo Support Ltd (domiciliary care) and Hera Management Services Ltd (property management) all gift aid profits back to the Parent to further its mission.

Policies, Risk Assessment and Our Supply Chains

Swan has set out, and circulated to all staff, a Modern Slavery and Human Trafficking Policy to enhance the various policies such as safeguarding, safe recruitment and equality and diversity which were already in operation. Its Whistleblowing Policy covers reporting Modern Slavery concerns. The principal actions which Swan has taken in accordance with the Policy are set out below.

Swan has risk assessed the Group's business and suppliers and determined that the greatest risk lies in its construction operations and use of its housing assets. As policies and procedures are reviewed, particular care is being taken to ensure consideration of the due diligence processes the Group undertakes in granting tenancies, selecting suppliers and appointing staff.

Swan's procurement system requires our suppliers to:

- declare that they are not involved in slavery or human trafficking and that they will ensure that they remain slavery and human trafficking free;
- take appropriate steps to ensure that there is no slavery or human trafficking in their own supply chains; and
- Provide a copy of their own Modern Slavery Act statement where required.

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Swan's policy is that it will only deal with suppliers who comply with the above requirements and will not undertake business with suppliers who are known to have engaged in modern slavery and are not taking positive verifiable steps to eliminate such activity from their businesses.

Effectiveness

The Board, Executive Directors and Senior Management have not been made aware of any issues of Modern Slavery within the Group's businesses or supply chains during the year and continue to believe that the policies and due diligence procedures in place remain sufficient to prevent or enable early identification of matters which may be of concern.

Swan has provided all staff with mandatory e-learning to ensure that they understand the potential risks of Modern Slavery in delivering our services and managing our supply chain and that they are able to spot the potential signs that slavery may be taking place.

This statement is made under section 54(1) of the Modern Slavery Act 2015. It constitutes the Group's slavery and human trafficking statement for the financial year ending 31st March 2020. The turnover of the Group exceeds £36m for that period. This statement has been approved by the Board of Swan Housing Association Limited who will review and update it annually.

Signed



Valerie Owen
Chair
Swan Housing Association Ltd

Signed



John Synnuck
Chief Executive
Swan Housing Association Ltd

Date: 9 July 2020