

Swan Housing Association Group Anti-Slavery and Human Trafficking Statement Year ended 31 March 2022

Introduction

Swan Housing Association and its subsidiaries ('Swan') together 'the Group' is committed to combating slavery and human trafficking and to:

- Undertaking and promoting ethical practices and policies to prevent modern slavery and human trafficking (Modern Slavery);
- Ensuring its staff 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 brilliant customer care and great places to call home. 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.

Provision of Housing

As a housing provider, we have vetting processes in place which monitor the people whom we house, as well as ensuring, through the management of our homes and neighbourhoods, that our properties are not used for the purposes of trafficking or allowing modern slavery to take place.

Policy

Our Modern Slavery and Human Trafficking Policy is available to all staff, Board and Committee Members and enhances other policies such as safeguarding, safe recruitment and equality and diversity. Our Whistleblowing Policy covers reporting modern slavery concerns and ensures full protection (and anonymity if required) of staff, contractors and members.

Supply chain and risk

Swan operates principally in Essex and East London. Our supply chains include goods and services for the construction, repair and maintenance of residential homes as well as the provision of care and support services. We also purchase goods and services to facilitate running our office premises. 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.

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.

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.

Staff training

Swan provides all staff, Board and Committee members with annual, mandatory e-learning to ensure that:

- they understand the potential risks of Modern Slavery in the housing sector, in delivering our services and managing our supply chain
- they are able to spot the potential signs that slavery may be taking place, and
- know what to do in the event they become aware of any indication that an employee, customer or a provider of products, goods or services appears to be the subject of slavery or where a resident may be involved in assisting some form of slavery eg by allowing or facilitating multi-occupation of their home.

Employees are required to report any suspicion of a breach of the Act to the Chief Executive or Executive Director of Governance and Compliance.

We continually seek ways to raise awareness of the risks of modern slavery and human trafficking through refresher training.

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.

We ensure that particular care is taken to ensure consideration of the due diligence processes the Group undertakes in granting tenancies, selecting suppliers and appointing staff and that this is also taken into consideration when reviewing policies, procedures and related processes.

Statement of Intent

In order to further enhance our commitment to modern slavery, we intend to:

- Add our modern slavery statement to the government's newly created register;
- Take steps to assure ourselves of the measures our suppliers are taking with regard to modern slavery in their organisations;
- Actively work to enhance the detection of modern slavery;

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 2022. 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



Pat Billingham
Chair
Swan Housing Association Ltd

Signed



Susan Hickey
Chief Executive
Swan Housing Association Ltd

Date: 24 August 2022