



Paradigm Housing Group: Modern Slavery Statement

1. Introduction

This statement sets out Paradigm's commitment to act ethically and to comply with the principles of the Modern Slavery Act 2015 (MSA). As required by the MSA, this statement outlines the steps we have taken to recognise and prevent potential incidences of modern slavery and human trafficking in our business activities and within our supply chains.

The statement covers our current position on modern slavery and activities undertaken during the financial year 2016/17. It will be renewed annually as required by the MSA.

2. Organisation structure, business and supply chains

Paradigm is a not for profit, registered provider of social housing. Operating across the south-east of England, we manage over 14,000 properties and have a large development portfolio of homes for both rent and sale.

Within the Paradigm Group, two organisations are registered as housing providers with the Homes and Communities Agency (HCA) – Paradigm Housing Group (Paradigm) and Paradigm Homes Charitable Housing Association (PHCHA), a subsidiary of Paradigm. Paradigm Development Services Limited (PDSL) is a wholly owned subsidiary of Paradigm, undertaking developments which are generally transferred to other group members on completion.

Paradigm (parent), PHCHA and PDSL, all have a turnover of over £36m, and therefore require formal coverage by this statement. However, our modern slavery statement applies to the whole Group, and all parts of the Group are expected to minimise the risks of slavery and human trafficking in their business and supply chains.

Responsibility for compliance with the MSA rests at the highest level with our Group Board, with responsibility delegated to the Executive Director of Finance (procurement and supply chain), the Executive Director of Corporate Services (human resources) and the Executive Director of Operations (safeguarding and vulnerable customers).

Our supply chain consists of services and goods, with the highest risk areas being associated with our development and maintenance activity. We do not currently have any supply chain outside the United Kingdom. We have an approved list of contractors and suppliers that we work with and our purchase order payment system requires the use of pre-approved suppliers. This means that there are more rigorous controls in place prior to expenditure being committed.

We recognise we may also come across slavery and/or human trafficking in connection with the vulnerable people we support, in particular those from minority or socially excluded groups. Such activities may also take place in property provided by Paradigm.

3. Policies and procedures

Procurement

Our procurement documentation states our commitment to ensuring that ethical trading and ethical labour policies and practices are incorporated in our procurement process. All potential suppliers must confirm they comply with applicable legislation, including, but not limited to, slavery, forced labour, human trafficking, immigration, health and safety and the environment. Companies who are required (by virtue of their turnover) to produce a statement on modern slavery will be asked to confirm they have such a statement and provide a copy where necessary.

During the annual review of existing suppliers, all current suppliers must sign to confirm that they comply with the MSA and undertake their own due diligence on their supply chains to limit the risk of modern slavery taking place.

Paradigm has a zero tolerance to breaches of compliance with applicable legislation. Should a breach be identified, we may provide the supplier with an opportunity to rectify the problem and implement a corrective action plan. We do however reserve the right to eliminate suppliers from our supply chain, should such concerns be identified.

Letting

At letting we undertake status checks, including photo ID and immigration, for potential adult occupiers, so we are confident we know who is moving into our properties.

Safeguarding

Following the implementation of the Care Act 2014, our safeguarding policy includes reference to modern slavery as a type of behaviour which constitutes abuse of a person at risk. Our safeguarding procedures and guidance outline the forms that modern slavery can take and highlight possible indicators of abuse/exploitation for frontline staff to be aware of.

Human Resources

Our Reporting Concerns at Work policy aims to encourage people to speak out and report concerns if they believe malpractice or wrong-doing is taking place. This includes actions by our suppliers and contractors. This policy is drawn to the attention of all new staff as part of the induction process.

The checks undertaken as part of our recruitment processes (such as eligibility to work in the UK and Disclosure and Barring Service (DBS) checks) also support our work in this area. As an employer, Paradigm pays the National Living Wage as a minimum.

4. Training

Training is provided to relevant staff on Procurement and Contract Management and part of this training covers the Modern Slavery Act 2015 and safeguarding.

Refresher training was provided for all front line staff in 2016/17 on safeguarding and our duty of care reporting system. This specifically referenced modern slavery as a type of abuse.

5. Due diligence

We have identified that the areas of greatest risk within our business and supply chain in relation to modern slavery are:

- Procurement; and
- supporting vulnerable clients.

The risk of modern slavery and human trafficking within our organisation is avoided and mitigated by adherence to our policies and procedures as described above and by ensuring staff are aware of potential risks.

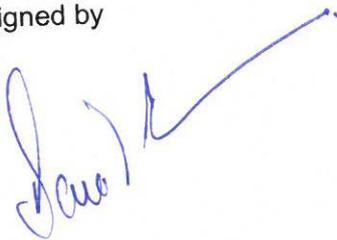
We are continuing to develop our approach and will be undertaking the following measures to further mitigate risk in this area:

- carrying out a review of our policy framework and making amendments to support compliance with the MSA, including specific reference to modern slavery where relevant
- highlighting our statement on modern slavery to every employee, via our intranet, and supporting this with guidance as to how employees may recognise potential incidences of modern slavery and how they should report these
- reviewing our procurement documentation to ensure that adequate safeguards are in place at each stage in the procurement process, including consideration of specific clauses in our contracts
- investigating the inclusion of a module on modern slavery in our new Learning Management System.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Paradigm's modern slavery statement for the financial year 2016/17.

Approved by the Group Board on 27 September 2017

Signed by

A handwritten signature in blue ink, appearing to be 'John', with a long, sweeping flourish extending upwards and to the right.

On behalf of the Board