



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 2018/2019. 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 15,000 properties across 34 different local authorities in South East England and have a large development portfolio of homes for both rent and sale.

Within the Paradigm Group, two organisations are registered providers of social housing – 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 sourced and supplied from both the UK and abroad. 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. We will not deal with or do business with any company that is knowingly involved in slavery or human trafficking in any part of its operations.

We will continue to review our procurement policies regarding tenders and contracts to ensure they reflect best practice and which mitigate against the risk of modern slavery.

3. Policies and procedures

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

Our policies and strategies that are relevant to modern slavery are:

- Anti-bribery and corruption policy
- Group Code of Conduct (contained within the Code of Governance)
- Procurement strategy
- Recruitment policy
- Safeguarding policy
- Vulnerable person's policy
- Whistleblowing policy

Our Modern Slavery Statement is a mandatory read and all policies are available for staff to view on our Intranet.

Procurement

We have not identified any breaches of the Act during 2018/19. We will continue to be vigilant and where a compliance breach is identified, we will act promptly, involve the appropriate lead agencies and feedback lessons learnt in order to minimise the risk of an incident occurring again.

We are committed to ensuring that ethical trading and ethical labour policies and practices are incorporated in our procurement process and have taken the following steps:

- All potential suppliers must confirm they comply with all 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 contracts, all 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.

Letting

At letting we verify identity and residency status checks, including photo ID, immigration and age checks of those signing our tenancy agreements. We will through our tenancy management policies and procedures aim to ensure that we understand who is living in our properties that we manage.

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

We are committed to ensuring that our employees and workers are not subject to any form of servitude, forced, compulsory or bonded labour. We will have a duty of care towards our employees and they will have the freedom to leave freely and without threat to themselves or their family.

All our employees will be treated fairly and equally. All our employees will be provided with clear and transparent information about rates of pay, hours worked and legal deductions.

Our Reporting Concerns at Work (whistleblowing) 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

We have continually sought to raise staff awareness of the risks of modern slavery via our learning programmes and communication channels. We will continue to provide relevant information and training as part of this work.

Training is provided to relevant staff through our new upgraded Learning Management System (LMS).

Courses available include:

- Safeguarding Children & Vulnerable Adults
- Duty of Care
- Equality in the workplace
- Modern Day Slavery

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 2018/2019.

Approved by the Group Board on:

Signed by



On behalf of the Board