

NEWPORT CITY HOMES - MODERN SLAVERY STATEMENT – 2019/20

This Statement has been published in compliance with the Modern Slavery Act 2015 and constitutes the association's slavery and human trafficking statement for financial year ending 31 March 2019.

Introduction - In October 2015, the Modern Slavery Act came into force which requires all businesses with a turnover of more than £36m to publish a statement setting out its actions to understand and address all potential slavery and human trafficking risks within their organisation and associated supply chains.

Structure - Newport City Homes (NCH) is a Registered Social Landlord (RSL) based in Newport providing social housing for approximately 10,000 homes across the city of Newport, with supply chains operating solely within the UK, the majority of which being local to Newport. NCH currently employs 375 employees with an annual turnover £48.2 million.

Due Diligence - The association has safeguards in place that require its suppliers and contractors to comply with the Modern Slavery Act, and commits to never knowingly engaging suppliers or contractors involved in slavery and/or human trafficking. With robust checks in place, the risk of slavery and human trafficking across the association and within its supply chain has been assessed as low. Nevertheless, the association is committed to a zero tolerance approach to slavery and human trafficking, this Modern Slavery Statement confirms its commitment to act ethically and with integrity across the association and associated supply chain.

What is already in place

The association's policies and procedures reflect its commitment to acting ethically and with integrity:

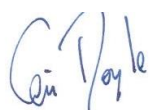
- The association's procurement process requires all potential contractors/suppliers, with a turnover of £36m and above, to provide the association with a copy of their Modern Slavery Act Statement and confirmation, in writing, they comply with the Modern Slavery Act.
- As part of the procurement process, all contractors/suppliers, with a turnover of £36m and above, will, upon appointment, ensure that any sub-contractors/suppliers providing services to NCH, comply with the Modern Slavery Act 2015.
- The association's Anti-bribery Policy is committed to applying the highest standards of ethical conduct and integrity across the association's activities. Every employee and individual acting on the association's behalf is responsible for maintaining the association's reputation and for conducting business honestly and professionally.


- The association's whistleblowing policy is committed to the highest standards of quality, transparency and accountability, with an established procedure for raising a whistleblowing concern in confidence and compliant with current relevant legislation.
- To support the association in preventing slavery and human trafficking in NCH properties:
 - Prospective tenants have their eligibility to housing assessed by Newport City Council who are the owners of the common housing register within Newport.
 - NCH carry out a 'Getting to Know You' assessment with all tenancy applicants to validate the information provided before an offer of accommodation is made.
 - The association continuously refreshes its insight data upon each interaction with residents to mitigate the risk of tenancy fraud.
- The association's tenancy agreement allows for a full investigation into any potential breaches of tenancy, including illegal or immoral use of the premises, working with partner agencies to resolve such cases.
- NCH are committed to train staff to identify risks to residents and escalate accordingly. NCH staff operate within safeguarding guidelines and have been trained to identify, monitor and support vulnerable residents, linking in with external support providers as necessary.
- The association's code of conduct policy commits all NCH employees and board members to integrity of actions and transparency, thereby avoiding any suggestion of influence by improper motives.
- The association's human resources team maintains recruitment policies to protect against slavery and/or human trafficking eg undertaking pre-employment checks as part of the association's recruitment process to ensure that all prospective employees are legally entitled to work in the UK.

NCH's commitments

- NCH will continue to carry out the actions above and in addition will ensure that staff are made aware of the slavery and human trafficking risks by the provision of appropriate briefings and training throughout 2019-20.

This statement has been reviewed by the Chief Executive Officer and approved by NCH board on 23 May 2019 and will be updated annually.

Signed:  Chief Executive, Date: 23 May 2019

Signed:  Chair of Board, Date: 23 May 2019