

Plus Dane Housing

Modern Slavery & Human Trafficking Statement

2023

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Welcome to Plus Dane Housing Limited's (Plus Dane) modern slavery and human trafficking statement for the financial year ending 31 March 2023. Plus Dane publish this statement with a resolute commitment to ensuring that there is no slavery and human trafficking within our business or our supply chain. This commitment is supported by robust controls and processes. We will not do business with any organisation that knowingly is involved in modern slavery or human trafficking. We treat our colleagues fairly by paying the real living wage and in 2023 achieved the Liverpool City Region Fair Employment Charter.

In our communities, we partner with agencies to prevent and protect against modern slavery and human trafficking and are committed to taking swift action against individuals living in our communities who are found to be involved. We also recognise issues around cuckooing and see our role as vital in tackling this criminal behaviour and protecting our residents.

This statement sets out the practices we used in the year ending 31 March 2023 to prevent modern slavery and human trafficking.

Our structure

Plus Dane is a registered housing provider and developer operating across Merseyside and Cheshire in the North-West of England. We own and manage over 13,500 homes, have an asset value in excess of £570 million and employ over 500 colleagues. We are wholly registered in the UK. We have one subsidiary, Dane Partnership Homes, which is currently dormant, and its future is being reviewed by the Executive and Board.

We provide and manage housing and deliver associated services to those in need and our vision is to tackle social inequality by helping individuals and communities to thrive. One of our guiding principles is equality, diversity and fairness. In 2022 a task and finish group of Board and colleagues reviewed our approach to equality, diversity and inclusion to strengthen our approach ensuring we are a fair and inclusive organisation to work for, receive services from and do business with.

There are three main elements to Plus Dane's operations. Firstly, we provide core landlord services with additional tenant care and neighbourhood outreach programmes to support our tenants and communities. Secondly, we manage our existing homes through our asset management function by maintaining homes and running a cyclical investment programme. Thirdly, we develop new homes through our development function, predominantly for affordable rent or shared ownership. We have a development pipeline of around 150 homes a year, with the ambition to increase this to 300 per year.

We are a values-based organisation and have co-created four core values with colleagues which are supported by a competency framework in which we are clear on expected behaviours.



learn
and grow



work
together



achieve for
our customers



take
ownership

All of Plus Dane's operations are conducted within the UK and the majority of our first-tier supply chain is UK based. A small number of our colleagues work on a seasonal basis to respond to grounds maintenance requirements within the summer months. A small percentage of colleagues at any moment in time may be employed on a fixed-term basis where, for example, work is attached to delivering a specific contract. However, our overwhelming preference is for permanent contracts of employment.

Our supply chain

Contracts and suppliers are procured in accordance with our Procurement Policy and procedures, Standing Orders, Financial Regulations and where applicable Public Contract Regulation 2015. We have a dedicated Procurement Team with the required expertise to run and guide procurement exercises to ensure legal, regulatory, and statutory compliance. Through our procurement processes we ask pre-qualification questions with a requirement for suppliers and contractors to have measures in place to minimise risk of modern slavery in their business.

Our suppliers need to demonstrate they need to fulfil the standard criteria issued by the Cabinet Office. This requires suppliers to identify if Section 54 of the Act applies to their organisation. If so, they are required to provide assurance that they are fully compliant with the annual reporting requirements set out in Section 54 of the Act. Failure of a supplier to demonstrate their compliance with the requirements of the Act will result in removal from the procurement process.

In 2022/23 we reprocured our strategic partnership, valued at up to £167 million over the next ten years to deliver repairs and maintenance services across Plus Dane homes; our strategic partner shares our commitment to preventing modern slavery and human trafficking.

As an area for improvement, we are currently revising our Procurement Policy to strengthen arrangements for smaller suppliers and subcontractors.

Policies in relation to slavery and human trafficking

We have a policy framework which ensures a consistent structure to policy and procedures across Plus Dane; policies and procedures are reviewed triennially unless a review is triggered by service failures, legislative or regulatory changes. Policies are available to colleagues, our supply chain and to customers on request. Each policy has a statement relating to modern slavery and human trafficking to enable us to ensure our policy and procedures are aligned to our commitment in this area.

Our key policies that give us the power to identify and deal with modern slavery or human trafficking under the Act are:

- Safeguarding Policy
- Whistleblowing Policy
- Code of Conduct
- Anti-Fraud Policy
- Anti-Bribery Policy

- Anti-Money Laundering Policy
- Conflict of Interest Policy
- Procurement Policy
- Code of Conduct

Our Whistleblowing Policy, reviewed and approved in March 2023, makes clear that a report of concern in relation to modern slavery or human trafficking can be made under the protection of the policy.

Responsibility for modern slavery resides within our safeguarding function and therefore is a component of our Safeguarding Policy, which also covers how Plus Dane identifies, supports and signposts vulnerable or exploited people, whatever the circumstances. Our Board has identified a safeguarding champion (not agreed yet) who provides expert support and oversight in the delivery of safeguarding practice across Plus Dane.

We engage regularly with our recognised trade union body covering workers' rights and employment welfare and we are compliant with UK employment law. Our line managers regularly engage with colleagues and create time for welfare issues to be discussed and investigated.

Our colleague survey 2023 demonstrated that 86% of our colleagues know how to access wellbeing services, up 4pts from 2022. 85% of colleagues believe their line manager is interested in their wellbeing an increase of 2pts from the previous year.

Plus Dane's Procurement policy, due for review in 2023, makes clear our commitment to ethical and sustainable procurement and ensuring our compliance with the Modern Slavery Act. We are also reviewing our contract management processes so that we ensure continued compliance through the life of the contract.

Due diligence process in relation to slavery and human trafficking

We have considered how slavery and human trafficking can arise in delivery of our activities and are committed to taking reasonable steps to make sure we have robust policies, processes and knowledge to ensure it is not present. Here are some examples of how these issues could present:

- Procurement – modern slavery can occur in a supply chain through inadequate or inappropriate procurement practices. Our supply chain consists mainly of services rather than goods, with the highest risk areas being associated with our building and maintenance activity.
- Vulnerable customers and communities - 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 who may be subject to forced labour and/or domestic servitude. Equality impact assessments are completed for all policies services and appropriate actions put into place to support vulnerable customers. We acknowledge we work in some of the most deprived areas of the UK and will ensure we form key partnerships so that we can address, through a multi-agency approach, county lines, slavery or trafficking cases.

- Homes – a proactive tenancy management approach, knowing what happens behind our front doors should ensure we reduce the possibility of illegal and unwanted activity in our homes. We also take a proactive approach to empty home management to ensure homes are not vacant for any longer than necessary.

We have identified the main risks in respect of these key areas and put measures in place to mitigate them. These include:

- A comprehensive policy framework with modern slavery and human trafficking considered in each policy review
- Mandatory training for every colleague
- Screening our procurement documentation to ensure that adequate safeguards are in place at each stage in the process
- Ensuring Plus Dane and our preferred suppliers have the right recruitment processes including eligibility to work in the UK and Disclosure and Barring Service (DBS) or Disclosure Scotland checks

Risk assessment and management

We have undertaken risk assessments of the high-risk areas detailed above using the toolkit created by Co-operatives UK Limited in 2017. Higher risk areas were identified in areas that we purchase raw materials for both the development of new homes and investment in existing ones. Most of this risk exists beyond the first tier of our supply chain. We will refresh the risk assessments in 2023/24 so we can further our commitment in this area particularly considering the re-procurement of both our strategic partner and single supplier in 2023.

Effective action taken to address modern slavery

No cases of modern slavery or human trafficking have been identified or reported to Plus Dane the year ending 31 March 2023. However, our close working relationship with local authorities has meant that we support them as modern slavery activities issues emerge. We have dealt with a county lines case and through close partnership working are taking legal action to respond to the impact this has had on our communities.

Liverpool City Region has recently been focusing on exploitation and modern slavery through county lines activities. Plus Dane has been supporting the region by participating in community safety partnership meetings and Merseyside ASB strategic group.

In Cheshire East, as part of their approach, our front-line staff have attended training delivered by the local authorities Community Safety Team focusing on awareness around modern slavery.

Our Community Safety Team will be focussing on reaffirming our partnership approach with local authorities where we have not been regularly invited to Community Safety Partnership meetings.

Training on modern slavery and trafficking

Plus Dane is committed to the continuous learning and development of our colleagues. In carrying out our role of supporting vulnerable customers we may come across slavery and/or

human trafficking, in particular those from minority or socially excluded groups who may be subject to forced labour and/or domestic servitude, and potentially in connection with our workforce or accommodation we provide that could be used as a venue for modern slavery. Modern Slavery is built into our mandatory safeguarding training for all colleagues in Plus Dane; in 2023 99% of colleagues completed this training.

Safeguarding Level 2 training has been delivered to front line colleagues which includes county lines and modern slavery.

We have discussed the Act, its purpose and Plus Dane's attitude to it with our Board. Our Community Safety Team has recently, as part of strategic sessions ahead of each Board meeting, discussed with Board the challenges of responding to county lines cases and how Plus Dane operates a multi-agency and zero tolerance approach.

Senior Managers have been alerted to the implications of the Act and are expected to continue to consider where the risks of modern slavery or human trafficking may occur in their areas of the business.

Our Procurement Team has been provided with guidance on the need to avoid these risks and how to identify indicators of them within the Plus Dane supply chain. We will continue to enhance the assurances sought from members of our supply chain regarding their avoidance of modern slavery and human trafficking.

Declaration

This statement is made pursuant to section 54(1) of the Act for the financial year ending 31 March 2023 (1 April 2022 to 31 March 2023) and approved by the Plus Dane Board on 27 July 2023.

Signed by Ian Reed

Chief Executive Officer of Plus Dane Housing Limited