



Incommunities Group Limited Modern Slavery and Human Trafficking Statement

1 Introduction from the Chief Executive

As a Registered Social Landlord, we recognise our duty to combat modern slavery and human trafficking in all of its forms. We take steps to ensure it is not part of our business or our supply chains. This Modern Slavery and Human Trafficking Statement is an expression of our commitment to continuing to combat the tragic trade in human life.

Incommunities is committed to taking a balanced approach to combat Modern Slavery and Human Trafficking. We will combine support and assistance to tackle Modern Slavery and Human Trafficking with swift and proportionate enforcement action if it is identified in our Organisation or any of our supply chains

2 Organisation's structure

Incommunities is one of the largest social housing providers in the UK. We provide affordable, high quality homes, principally for rent in neighbourhoods across the Bradford District and South and west Yorkshire.

We currently own nearly 21,300 homes for rent and have almost 1,000 leasehold properties. We offer a range of housing options and services aimed at meeting the needs of our local communities and employ approximately 1,000 people. Our vision is improving Lives Incommunities. We believe that everyone should have the opportunity to fulfil their potential and communities should be great places to live.

3 Our supply chains

Our supply chains include goods and services for the construction and repair of residential homes. For example, we contract with developers to build homes and with retailers to provide spare parts for heating systems. Our supply chain also includes the goods and services normally expected of any business. For example, ICT equipment, office furniture and cleaning. We also lease motor vehicles.

4 Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems

and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

5 Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk during Procurement, either from a framework or by buying from the open market, we will exercise due diligence to avoid Modern Slavery and Human Trafficking playing any part in our supply chain. We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

6 Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a rigorous supply chain compliance programme.

Key players in the fight against Modern Slavery and Human Trafficking in our Organisation are;

- Legal Services
- Audit
- Human Resources
- Procurement

7 Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. We expect our business partners to provide appropriate training to their staff.

8 Our effectiveness in combating slavery and human trafficking

Any suspected Human Trafficking or Modern Slavery would be immediately reported to our Chief Executive Officer and our Group Board. It would then be dealt with appropriately.

We are part of a home office pilot with other public authorities to identify, report and support victims of Modern Slavery and or Human Trafficking. We currently have three members of staff who are the Modern Slavery Safeguarding Leads for the whole of the Bradford District. These Officers support front line workers in identifying potential victims and making Reasonable Grounds Decisions to (allow potential victims quick access to the National referring Mechanism and

related support)when victims of Modern Slavery and or Human Trafficking are identified to us

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. The law defines modern slavery as 'holding a person in slavery or servitude or requiring a person to perform forced or compulsory labour.' It defines human trafficking as 'arranging or facilitating the travel of another person with a view to exploiting them'

This Statement constitutes Incommunities Modern Slavery and Human Trafficking Statement for the financial year ending 31 March 2016.

Signed:

Signed:

Date: 24 March 2016



Geraldine Howley
Chief Executive
Incommunities Group Ltd



Dave Procter
Chair
Incommunities Group Ltd