

Sentinel Housing Association

Slavery and Human Trafficking Statement

1. Introduction from Mark Perry, Chief Executive

We are committed as an organisation to improving our practices to combat slavery and human trafficking and are proud of the steps that we have already taken to do this. As an organisation, we recognise that everyone has a part to play in ensuring Modern Slavery does not occur throughout the business and its supply chains and will continue to monitor and evaluate how our practices can be improved and refined.

We have set out in this statement our approach to identify and manage the risks associated with slavery and human trafficking and are looking as an organisation to build upon the processes we already have in place to ensure that we, along with our partner organisations remain committed to prevent slavery and human trafficking.

2. Organisation's structure

Sentinel Housing Association is a not-for-profit landlord which owns and manages around 10,000 homes 3,400 garages and 20 shops. Our homes range from town centre apartment blocks to rural cottages.

We are run by a board including two resident board members, plus others drawn from a wide mix of backgrounds in both the public and private sectors. We also have a four strong Executive team, who are responsible for day-to-day matters and ensuring that the board's wishes are carried out throughout the organisation.

We have a global annual turnover of around £60m which we use to reinvest back into our neighbourhoods, or other work including upgrades of existing homes, regenerating outdated estates, or simply building more homes.

For more information about what we do and our board and management structure please follow the links below:

Board - <https://www.sentinelha.org.uk/corporate/governance/board>

Executive Team - <https://www.sentinelha.org.uk/corporate/governance>

About us - <https://www.sentinelha.org.uk/corporate>

3. Our supply chains

As well as operating with supply chains from UK based firms, our new build development programmes have involved supply chains with companies based in Scandinavia and Ireland.

Our supply chains that form part of our asset management programme also includes refurbishment programmes which rely on products being supplied by overseas companies including those based in Scandinavia and Ireland.

4. Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery in our supply chains or in any part of our organisation. Our approach to doing business 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.

Our staff recognise and understand our commitment to combatting modern slavery and human trafficking and are aware of the impact that this can have.

Our Anti-slavery policy is available to all our staff and we inform our suppliers of our commitment to preventing modern slavery. [We are looking to develop and produce a specific policy which reflects our values in preventing slavery and human trafficking through our organisation and supply chains].

5. Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk 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; and
- Protect whistle blowers.

6. Our risks and how we manage this

As a single site organisation that operates within the UK, we have recognised that our risk as an organisation is comparatively low. However, as part of our ongoing process to identify and monitor risks we have identified that our key area of risk lies in our relationships with supply chains and contractors, particularly those based overseas. Having recognised this, as an organisation we seek to remain vigilant in all

our overseas dealings and encourage staff across the organisation to report any concerns that may arise on the subject of slavery and human trafficking. We are committed to not working with any organisation that has a history for failing to adhere to our values.

To manage this risk, we require third parties to acknowledge our commitment to combat slavery and human trafficking by inserting relevant clauses into our agreements.

Supplier adherence to our values

As an organisation 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 supply chain compliance programme. As part of this, we insert an anti-slavery and human trafficking clause into all of our new agreements with suppliers and contractors which informs them of our commitment to combatting slavery and human trafficking and requires them to agree to this commitment when working with us. As a condition of these contracts, we are able to withdraw from working with any organisation that breaches this legislation or does not operate within our values of compliance.

We are committed as an organisation to tackling modern slavery and human trafficking and want to work with suppliers who share our values.

7. Our effectiveness in combating slavery and human trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our organisation or supply chains:

- keeping track of any complaints, suspicions or concerns raised by staff or any third parties with regards to slavery and human trafficking;
- monitoring any incidents or allegations across our supply chains which conflict with our values;
- recording any incidents or complaints received from any third parties concerning slavery and human trafficking.

8. Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking across our organisation and our supply chains, we intend to roll out a training program to our staff to highlight the risks and explain their obligations. All

staff will be encouraged to attend training in this area to better understand the risks and how we as an organisation are working to manage this.

This training will involve setting out the offences of slavery and human trafficking and the impact that these offences have, explaining the organisation's zero tolerance approach to modern slavery and highlighting the processes in place to identify and manage the associated risks.

We also encourage our business partners to provide training to their staff and suppliers.

9. Further steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- education and promotion of our Anti-slavery Policy along with a training program to ensure our staff understand and adopt our values; and
- implementation of a modern slavery policy designed to highlight the risks and the processes in place to manage these.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2016.

Mark Perry, Chief Executive **Sentinel Housing Association**