

# THE BARNET GROUP

## Modern Slavery Act Transparency Statement

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by The Barnet Group Ltd and other relevant group companies ("The Barnet Group"), in particular Barnet Homes Ltd, during the financial year ending 31 March 2020 to reduce the risk of modern slavery in its business and supply chains.

### INTRODUCTION

This is The Barnet Group's fifth Modern Slavery Act Transparency Statement. We are committed to preventing opportunities for modern slavery from occurring within our supply chain or in any part of our business, and to safeguarding any customers who may be at risk. In the past year we have continued our work to address the risk of modern slavery, ensuring that we have in place effective responses to that risk.

We consider modern slavery to be a growing issue both within the UK and globally. According to the Global Slavery Index, modern slavery is the second largest criminal industry in the world, affecting an estimated 40.3 million people globally on any given day in 2016. Within Europe and Central Asia, 3.59 million people were estimated to be affected by modern slavery, with 91% in forced labour. Within this region, the UK ranked 38 of 50 countries for the highest prevalence of modern slavery, with 2.1 victims per 1,000, and an estimated 136,000 people in total affected by modern slavery in 2016. In 2019, the Home Office's National Referral Mechanism received 10,627 referrals of potential victims of modern slavery; an increase of 52% from 2018. Labour exploitation was the most common type of exploitation for both adults and minors.

As a public body, we play a key role in tackling modern slavery through:

- identifying and referring victims;
- supporting victims through our safeguarding activities and housing and homelessness services;
- supporting and delivering community services and activities in partnership; and
- ensuring that our business and supply chains are free from modern slavery.

Our employees may come across modern slavery in different ways while going about their everyday duties, including:

- delivering housing and homelessness services;
- supporting community activities that may intersect with organised crime, gangs, drug-selling, and other crimes such as cannabis cultivation;
- engagement with MPs and Councillors and concerns they may raise regarding our residents and the properties we own or manage;
- resettling refugees or asylum seekers;
- general contact with customers and members of the public; and
- safeguarding activities, including supporting victims who may be adults with care and support needs, or children.

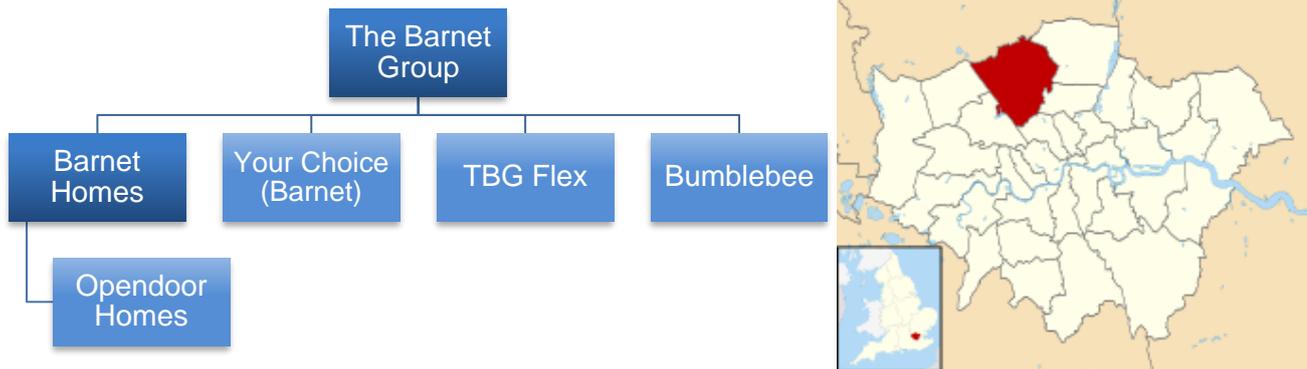
#### Key areas of focus in 2019/20:

- continuing to raise employee awareness of the issues regarding modern slavery, including reviewing our mandatory safeguarding e-learning and procuring a new modern slavery e-learning course;
- continuing to review and update staff and contractor policies and related documentation to ensure they include modern slavery;
- updating our induction checklist to include our modern slavery briefing and related policies;
- reviewing our contract procedure rules to ensure compliance with legislation.

## OUR BUSINESS

The Barnet Group is a not-for-profit Local Authority Trading Company that delivers services on behalf of the London Borough of Barnet (“the council”). It includes Barnet Homes, which was established as an Arms-Length-Management-Organisation (ALMO) in 2004, as a wholly-owned subsidiary of the Council, to manage its properties.

In 2012, The Barnet Group was formed, the council’s homelessness service was transferred to Barnet Homes, and Your Choice (Barnet) was created as a specialist provider of Adult Social Care services. In 2015, The Barnet Group’s employment arm, TBG Flex, was created along with TBG Open Door (“Opendoor Homes”), a subsidiary of Barnet Homes which gained Registered Provider status with the Regulator of Social Housing in March 2017, let its first properties in September 2018, and in 2020 became a registered society pursuant to section 115 of the Co-operative and Community Benefit Societies Act 2014. Bumblebee, an online private lettings service, was created in 2017 and was launched in May 2018.



The principal activities of The Barnet Group include the day-to-day management, maintenance, and improvement of the housing stock; management of the homelessness service; the development of new properties on behalf of the council; and the provision of specialist Adult Social Care services. As a group, we employ over 1,000 people, 100% of whom work in the UK, full- or part-time. We manage around 14,000 homes on behalf of the council, mostly within the London Borough of Barnet, in addition to providing Adult Social Care and other services. Through our private registered provider Opendoor Homes we have developed and own a small but growing number of our own properties. Our main customers are residents living in social housing and those at risk of homelessness, leaseholders, Adult Social Care clients and their families, and private tenants and landlords.

We are an organisation with a strong sense of social purpose that is driven by our values: show respect, find solutions, and make a difference. Much of our work is focused on supporting the wellbeing and welfare of our customers, and we work in partnership with other agencies and public bodies to identify and support vulnerable residents. We also aim to be a great place to work for all our employees, and to attract and retain the best talent.

Through our approach to being a responsible business, we aim to:

- responsibly manage our supply chain;
- treat customers and suppliers fairly and with respect; and
- align ethical procurement with value for money.

Whilst there is no typical victim, statistics show that risk is higher amongst the most vulnerable, ethnic minorities, or socially-excluded groups. These groups are over-represented within social housing and Adult Social Care, and we are therefore committed to taking action to reduce the risk of modern slavery across all parts of our business.

We recognise that modern slavery is so pervasive that it may exist in the supply chains of the goods and services we purchase, including the technology we buy and our construction projects. We have a responsibility to ensure public money does not inadvertently fund criminal activity, and to protect vulnerable workers in our supply chains from exploitation.

## RISK AND OUR SUPPLY CHAINS

The Barnet Group operates entirely in the UK, and largely in highly-regulated sectors. Although regulated by OJEU and The Public Contract Regulations 2015, the Barnet Group's goods and services are almost exclusively provided by UK-based suppliers. We consider our risk to generally be low, and regard the areas of potentially higher risk to be in the following areas:

- Procurement of services – modern slavery can occur in a supply chain through inadequate or inappropriate procurement practices. Our supply chain consists mainly of services, with the highest risk areas being associated with our construction, maintenance, and cleaning activities. We have robust tendering and other processes for procurement in these areas; however, we are in the process of introducing additional conditions and controls.
- Procurement of goods – modern slavery is a risk in the ICT hardware and electronics that we purchase. Our procurement of ICT hardware is complex as it covers a large number of commodities that we may buy directly or indirectly, in bulk or in small quantities, and from a range of vendors depending on business needs. We also have limited visibility of our ICT supply chains. This is partly due to the multiple levels of sub-contracting for the raw material extraction, component manufacturing, assembly, and logistics. We will work with our partners the London Borough of Barnet and Capita to mitigate risks and develop sustainable solutions.
- Supporting vulnerable clients - 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, and potentially in connection with our workforce. The properties we own and/or manage could also be a potential venue for modern slavery.

We have put in place measures to mitigate the main risks arising from these areas, including:

- continuing to review our policy framework and implementing amendments to support compliance;
- strengthening our approach to mandatory training for every employee, explaining the implications of the Modern Slavery Act, and how they should recognise and report potential incidences;
- screening our procurement documentation to ensure that adequate safeguards are in place at each step in the process;
- ensuring that The Barnet Group and any preferred supplier employment agencies we use have the correct checks within recruitment systems, such as eligibility to work in the UK, and Disclosure and Barring Service (DBS) checks;
- implementing robust tenancy management processes; and
- developing strong close-working with other agencies to tackle issues and concerns related to modern slavery within the communities we support.

In 2019/20, The Barnet Group spent approximately £144 million on external goods, services, and works varying from construction of new buildings, property maintenance, cleaning, and other support, professional, and people-based services; of this, approximately £105 million was spent by Barnet Homes. These goods, services, and works are procured from a wide variety of local and national organisations, businesses, and voluntary sector organisations.

Our business model involves a number of supply chains across our business; primarily to help build, manage, and maintain our homes, and provide Adult Social Care services. The Barnet Group works with approximately 3,630 vendors, of which Barnet Homes work with approximately 2,923. Occasionally, our contractors may employ sub-contractors to delivery specialist services. This complexity within our supply chain increases the risk of involvement in modern slavery; however, we require our suppliers and contractors to comply with the Modern Slavery Act 2015 in order to work with us and have processes in place to ensure we work with reputable companies. Our procurement procedures ensure adequate procurement pricing, prompt payment, and good planning, and wherever possible we aim to have long-term relationships with our suppliers.

Although risks associated with modern slavery are often heightened within the care sector due to the employment of agency workers, outsourcing, or sub-contracting, The Barnet Group does not outsource or sub-contract its care services, and employs over 90% of its employees directly. We do not recruit on seasonal contracts, and aim to minimise the number of temporary and agency workers across the business. Where we do recruit temporary workers, our aim is to work with reputable agencies to meet the needs of the area of work, with preferred agencies appointed where appropriate. We have a strong relationship with recognised trade unions, and our employees have access to representation and to join an independent trade union.

We recognise that during the COVID-19 pandemic there is an increased risk of modern slavery. Our actions to help mitigate the risk of modern slavery during the pandemic include:

- Health and safety – we have implemented local and national government policies throughout our supply chain, including social distancing measures and paying statutory sick pay;
- Supporting suppliers – to avoid workers being unpaid for work completed, we have prioritised our engagement with suppliers and are ensuring they are paid promptly for the works and services they continue to provide during this period;
- Grievance procedures – our employees still have access to grievance procedures where needed, and our approach to our People-related policies has been adapted in light of the pandemic to ensure flexibility where practicable;
- Recruitment – where demand has increased within our services and there has been a need to recruit additional and temporary workers, we have maintained rigorous checks on our supply chains to protect vulnerable workers.

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## OUR POLICIES AND PROCEDURES

Our policies set out the framework in which we operate to ensure that the risk of modern slavery within our business and our supply chain is reduced. They specify expectations of our employees, suppliers, business partners, and others who are directly linked to our business operations and services. Our policies are endorsed and approved by senior management, and are shared widely with our employees. Our current approach includes:

### Modern Slavery

Since 2017 we have had in place a Modern Slavery Act Compliance Policy that sets out our commitment to tackling the risk of modern slavery within our business and our supply chain and to safeguarding the wellbeing of our customers and employees, and includes how we will deal with any related concerns.

### Recruitment

We treat all our employees fairly and equally. Our Recruitment and Selection Policy and processes include verifying each employee's identity and their right to work in the United Kingdom before they start work with us, to safeguard against human-trafficking or individuals being forced to work against their will, and against abuse or coercion once in our employment. Our offer of employment for directly-employed permanent and temporary employees includes:

- acceptance of terms and conditions within the contract of employment;
- receipt of satisfactory references;
- evidence of any required professional qualifications and essential requirements, such as clean driving licence;
- any necessary Disclosure and Barring Service checks, where applicable; and
- receipt of eligibility to work in the UK.

We monitor hours worked, rates of pay, and the calculation of legal deductions, and all new employees recruited through TBG Flex are provided with the same organisational benefits. We make salary payments directly to employees and do not delay, defer, or withhold payments unless there is prior arrangement or notification.

We have a free, comprehensive employee assistance service that offers guidance and counselling related to both the work activities and personal lives of our employees. This independent service also allows employees to raise concerns in a confidential manner.

### Employee Code of Conduct

The Barnet Group expects the highest standards of conduct from its employees. The Code of Conduct sets out employees' responsibility to serve our customers and the community in a way that is accountable and does not damage public confidence in the honesty and integrity of the Group, and to report without fear of recrimination any breaches of procedure or any impropriety.

### Whistleblowing

Our Whistleblowing Policy sets out our commitment to managing the organisation in the best way possible, and is in place to reassure our employees that it is safe and acceptable to speak up and raise concerns about actual or suspected criminal offences, including modern slavery, at an early stage. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith that their suspicion that modern slavery of any form is or may be taking place in any part of our own business or in our supply chain.

### Procurement

The Barnet Group is a public body and is governed by legislation including The Public Contract Regulations 2015. Our Financial Regulations and Contract Procedure Rules set out the way in which we operate in a financially responsible manner and how we procure and manage contracts with suppliers. Our Procurement Strategy 2018-21 has the aim of facilitating and improving procurement within The Barnet Group and its subsidiaries, with a focus on procuring fairly- and ethically-traded goods and services and promoting fair working practices.

### Safeguarding

Following the introduction of the Care Act 2014 and the Modern Slavery Act 2015, modern slavery, human-trafficking, sexual exploitation, and forced marriage are categories within London's multi-agency Safeguarding policies and training courses to which we subscribe, and are reflected in our own Safeguarding Policy and procedure. Our Safeguarding Policy and procedure provide measures to identify abuse or neglect, including modern slavery. They set out how our employees should report incidents and how to refer cases to the appropriate authorities where required.

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## SUPPLIER DUE DILIGENCE

The Barnet Group, as a public body, must follow the Public Contract Regulations 2015. We carry out due diligence checks prior to the award of and during contracts, as per the regulations through which mandatory exclusion rules apply. All procurements are subject to selection and award criteria which reflect our organisational ethos.

The Barnet Group's tendering process is completed electronically through a portal for contracts above £25,000, and uses the standard Selection Questionnaire which includes questions related to the Modern Slavery Act 2015. We have reviewed our procurement processes to ensure we have a robust approach to eliminating the risk of modern slavery within our supply chains, and will continue to make improvements here.

In 2017 we made changes to a number of documents including the form of tender, contract particulars, and contracts, to make specific requirements related to Modern Slavery. The Selection Questionnaire includes a failure implication should a potential supplier fail to comply with the Modern Slavery Act 2015's requirement to publish a Modern Slavery Act Transparency Statement, where required, or should a bidder have a conviction for an offence under Sections 1, 2, or 4 of the Act. Potential suppliers are required to upload their Transparency Statement, where applicable, to the procurement portal.

We complete a Most Economically Advantageous Tender (MEAT) check on low tenders to ensure that we take account of criteria that reflect qualitative, technical, and sustainable aspects of tenders in addition to

price, and compare with others; for example, through Constructionline and the Contractors Health and Safety Assessment Scheme (CHAS).

We use recognised public sector contracts. Our standard agreement or contract includes a number of termination clauses should a supplier be in breach of our requirements, including compliance with all local and national laws and regulations such as the Modern Slavery Act 2015. Our suppliers are also required to confirm that they provide safe working conditions for their employees.

Our contract managers liaise with suppliers on an annual basis to ensure they are aware of our approach and to check they are compliant with the requirements of the Modern Slavery Act 2015. Our standard contracts also include a right to request documents or access to information that we consider necessary to conduct any audit investigation. Our Procurement team maintains a procurement schedule that lists all of our contracts, and approves all new suppliers to the business, ensuring that they meet our eligibility criteria including compliance with the Modern Slavery Act 2015.

Should suppliers fail to comply with the Modern Slavery Act 2015, we may cease to trade with them. Should it be discovered that a supplier has involvement in modern slavery, The Barnet Group will involve the necessary authorities so that appropriate action can be taken.

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## ACTION TAKEN TO ADDRESS MODERN SLAVERY

We recognise that as a provider of social housing in London, modern slavery could impact upon The Barnet Group through our supply chain or concern could be noted when attending a resident's property. We are committed to acting ethically and with integrity and transparency in all our business dealings, and we expect our supply chain, contractors, employees, and all other business partners to commit to the same. This includes implementing and enforcing effective systems and controls to prevent and deter modern slavery.

During 2019/20 we have received no whistleblowing reports related to modern slavery, and no concerns have been raised regarding our supply chain.

### Safeguarding

Our Safeguarding Lead works closely with the Council and community groups on safeguarding matters, including attending the Safeguarding Adults Board and Safeguarding Children Board. We also have an internal Safeguarding Group that discusses safeguarding issues, concerns, and good practice.

During 2019/20 no safeguarding concerns were raised in relation to modern slavery. All our new starters were required to complete safeguarding training, which includes awareness of modern slavery. In 2017 our safeguarding lead participated in a modern slavery awareness briefing through Barnet's Safeguarding Adults Board that included speakers from the Police and community support groups.

### Procurement

In 2018/19 our Procurement Strategy 2018-21 was approved. Our Procurement officers have delivered briefings in team meetings to ensure that employees understand their responsibilities within our procurement processes.

### Recruitment and employment

We comply with current employment legislation and recruit all staff according to best practice. We work to the highest professional standards and comply with all laws, regulations, and rules relevant to our business. We expect the same high standards from those companies with which we work. In 2019/20 we reviewed our employee Code of Conduct, which is built around the recognition that everything we do in connection with our work should be measured against the highest possible standards of ethical business conduct.

### Tenancy Management

Many of our employees come into contact with members of the public on a regular basis, including our residents and service users, and frequently visit the properties and neighbourhoods managed by The Barnet

Group. In doing so, there is a possibility that employees could encounter somebody believed to be at risk of modern slavery.

We have robust processes in place to ensure that tenants are who they say they are when signing up to a new tenancy. Our housing management and caretaking staff and our repairs contractors monitor any external issues or changes with our properties or residents. We will always investigate any allegations from residents or the wider community regarding potential tenancy fraud. Our Housing Officers each have a target of 20 tenancy audits to complete each year, where our checks include for the signs of modern slavery, as well as other welfare concerns that the tenants or members of their households may have.

Should we have concerns, we use the information gained through the tenancy audit in line with our wider safeguarding approach, which may include conducting another visit without notice, legal action, and/or referral to appropriate authorities, including safeguarding referrals. We monitor unusual activities, such as requests for a high number of keys for a property, reports of large numbers of people visiting a property, and instances of locks on internal doors. In partnership with the council's Corporate Anti-Fraud Team (CAFT) we undertake key fob audits.

### Supporting communities

We are involved in a number of multi-agency groups with a range of partners including the Council, Police, GPs, and other organisations. These groups tackle issues and concerns including those potentially related to modern slavery, and work in partnership on preventative activities, including MACE (Multi-Agency Child Exploitation), VARP (Vulnerable Adults Risk Partnership), the Serious Violence Panel, and Community Safety MARAC (Multi-Agency Risk Assessment Conference).

We work closely with the Police to support investigations into and share information regarding concerns of modern slavery, and have instigated fortnightly liaison meetings to discuss emerging matters and share information. This has also included joint-working with the Gangs Unit, supporting Police efforts to address concerns of cannabis cultivation, and working closely in cases of "cuckooing" where vulnerable people are exploited in their own homes. In 2018 a number of our managers were also trained to deliver training on counter-terrorism to our employees.

Since 2017/18 we have commissioned the community group Art Against Knives to address gangs and serious youth violence on one of our estates; this work also includes addressing child sexual exploitation (CSE). Art Against Knives has partnered with a local women's aid organisation and the CSE unit within the local police force to support individuals at risk in the area.

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## TRAINING

Since 2017 we have provided regular in-house-developed briefings for our employees on modern slavery and our approach to managing associated risks. The briefing ensures that our employees:

- understand what modern slavery is;
- recognise the signs of modern slavery;
- understand their own responsibilities and the mechanisms in place within The Barnet Group to report any concerns around modern slavery; and
- have an overview of the wider support that is available to victims.

All new employees are required to review the modern slavery briefing and to complete safeguarding training through our e-learning portal. More detailed safeguarding training is provided for Your Choice (Barnet) employees who work closely with adults who are more vulnerable or at risk. Our Safeguarding Lead also receives modern slavery training as a member of the Barnet Safeguarding Adults Board (SAB).

In 2020/21 we will implement our newly-procured modern slavery e-learning, and will undertake more regular monitoring and reporting of its completion.

## MONITORING EFFECTIVENESS

In 2020/21 we will introduce and monitor new targets for the completion of modern slavery training by our employees, and will review the potential to introduce a wider range of performance indicators.

The main method of monitoring effectiveness within our supply chain is the selection criteria for suppliers, which includes a requirement to have measures in place to minimise the possibility of modern slavery in their business and supply chain. We also use Constructiononline, whose gold membership includes legislation checks such as modern slavery. We use Equifax reports and alerts to monitor the business status of our suppliers, along with checks of information held on the Companies House website.

We recognise that performance indicators are important in driving the performance of a business and shaping the way it operates, and that they can also affect how exposed the business is to the risk of modern slavery. We take this into consideration when setting performance indicators for our suppliers, and work closely with them to mitigate the risk that creating environments in which modern slavery, particularly in the shape of bonded labour, may become a way a supplier tries to deal with unrealistic short time pressures and related expectations (including late or extended payments, unfair penalties, and accuracy of technical specifications) on their operations or supplying partnership.

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## FURTHER STEPS

We will continue to review and update our employee and contractor policies and related documentation to ensure they support our aim to reduce the risk of modern slavery, including reviewing our Modern Slavery Act Compliance and Whistleblowing Policies.

We will review our performance indicators and look to initially measure and then, where possible, set targets related to modern slavery or potential modern slavery, including regarding the training of staff about modern slavery risks. We will also introduce a corporate compliance balance scorecard to include the completion rates of modern slavery training.

We will further strengthen our procurement and due diligence processes, including:

- formally documenting the annual review of tier one suppliers' Modern Slavery Act Transparency Statements, where they are required to produce these;
- completing our ongoing review of our Procurement Policy and contract procedure rules to ensure compliance with legislation and the delivery of our Procurement Strategy, including awareness of responsibilities, supplier compliance checks, and whistleblowing;
- proposing an amendment to the terms of reference for our internal audits of procurement and compliance to ensure our approach is compliant with the Modern Slavery Act 2015;
- adding modern slavery to our procurement process briefing for procuring managers; and
- working with our partners the London Borough of Barnet to start exploring ways to increase the visibility of our ICT goods and services supply chains, and ensure the sustainability of our procurement practices.

We will take further steps to ensure that our recruitment and employment practices and processes reduce the risk of modern slavery within our business, including reviewing our Recruitment and Selection Policy.

We will engage with our partners, and in particular with youth organisations, to raise awareness of issues concerning the exploitation of children in the selling and transportation of drugs.

We will take further steps to increase the awareness of our employees, including:

- ensuring 100% completion of mandatory modern slavery training, both for new starters and as refreshers for existing employees;

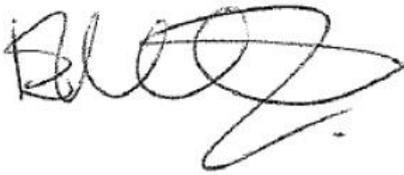
- implementing our newly-procured modern slavery e-learning course, with mandatory completion by new employees within one month of their start date, and two-yearly refreshers for existing employees;
- reviewing and updating our safeguarding training, and relaunching this for all new starters and as a mandatory refresher for existing staff every 3 years.
- working with the council to roll out both fraud awareness training with more detailed training for employees working in Finance and HR and managing contracts, and counter-terrorism awareness for frontline staff.

All employees will be made aware of our Modern Slavery Act Transparency Statement through our internal communications.

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## DECLARATION

This statement was approved by The Barnet Group's Board of Directors on 23 September 2020, and is made pursuant to section 54 of the Modern Slavery Act 2015.



Eamon McGoldrick  
Chair of the Board  
for and on behalf of The Barnet Group, including Barnet Homes