

Plus Dane Housing

Modern Slavery & Human Trafficking Statement

2024

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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 2024. Plus Dane publishes 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. Modern Slavery and Human Trafficking checks are made initially during the Procurement process and, since 2024, this has been expanded to include in quotations that fall below the threshold that requires formal procurement, so it includes quotations for services from smaller suppliers.

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, through our internal Community Safety Team, 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 2024 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, deliver services to over 30,000 customers, have an asset value in excess of £570 million, an annual income over £100m and employ over 600 colleagues. We work across 11 Local Authority areas and 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.

2023-24 was the first year of our new EDI framework and three-year action plan. We have focussed on improving our understanding of the demographics of our customers and colleagues to help us deliver a tailored customer and colleague experience, increasing opportunity for colleague involvement in our EDI activity and we have delivered equality, diversity and inclusion training for all Plus Dane staff in the Spring of 2024,

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 completed 159 new homes in 2023 and are targeted to complete 313 new homes in 2024, with a plan to average 212 completions of new homes over the next 3 years. 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.

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 Modern Slavery Act 2015 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 Plus Dane's 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.

Policies in relation to slavery and human trafficking

We have a Strategy & Policy Framework which ensures a consistent structure to policy and procedures across Plus Dane; policies and procedures are reviewed every three years unless a review is triggered by service failures, legislative or regulatory changes. Policies are accompanied by a Communications Plan to set out how and to whom they are shared and are available to colleagues through internal communications, and to customers, suppliers and stakeholders on request. Some of our policies are available on our website where appropriate. 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
- Anti-Social Behaviour 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 criminal activity, malpractice and wrongdoing, which encompasses modern slavery & human trafficking, can be made under the protection of the policy.

Our Anti-Social Behaviour Policy, which was reviewed in 2024, and covers the work of our Community Safety Team, makes clear that when we visit and interact with our tenants, we will consider signs of modern slavery and human trafficking, as well as any other welfare concerns which tenants or members of their household may have. Where we have concerns, we will raise this concerns through our wider safeguarding approach.

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. Plus Dane has a cross functional team of 16 Designated Safeguarding Officers who work with colleagues to support investigating concerns for the welfare of our residents, and Our Board has identified a safeguarding champion 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. We are an accredited member of the Wellbeing Charter, evidencing our commitment to colleague wellbeing across key elements of physical and mental health and we are a member of Liverpool City Region's Fair Employment Charter.

Plus Dane's Procurement policy, which was reviewed in 2023, makes clear our commitment to ethical and sustainable procurement and ensuring our compliance with the Modern Slavery Act. We have also reviewed our contract management processes so that we ensure continued compliance through the life of the contract. Our contract management meetings include a standard agenda item during contract management meetings to discuss adherence to Plus Dane's policies including modern slavery and human trafficking.

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 2024 and add Modern Slavery and Human Trafficking to our operational risk registers so we can further our commitment in this area.

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 2024. However, our close working relationship

with local authorities has meant that we support them as modern slavery activities issues emerge.

We deal with county lines cases where they arise and, through close partnership working, we take 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 authority's own Community Safety Team, focusing on awareness around modern slavery.

We have recently signed information sharing agreements with Warrington Community Safety Partnership and Cheshire West/Hartford areas to facilitate responding to reports of potential exploitation in areas where we have developed new housing stock.

In 2023 we supported the Office for the Police and Crime Commissioner's launch of Violence against Women and Girls strategy and continue to support the delivery plan and in 2024 we supported the OPCC's launch of Merseyside's Modern Day Slavery Network, designed to enhance the partnership across Merseyside and improve a consistency in approach and awareness.

Training on modern slavery and human 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 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 2024 (1 April 2023 to 31 March 2024) and approved by the Plus Dane Board on date 1 August 2024



Signed by Ian Reed Chief Executive Officer of Plus Dane Housing Limited