



Modern Slavery Statement 2025

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This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Berneslai Homes Ltd, for the financial year ended 31st March 2025. Our annual turnover exceeds the £36M threshold for this reporting.

Introduction

This statement sets out our commitment to eliminate, as far as possible, the risk of modern slavery and human trafficking taking place in our organisation and in our supply chain and the steps we have taken to ensure that slavery and human trafficking are not taking place in our organisation and in our supply chain.

Our Organisation

Berneslai Homes is an arm's length management organisation (ALMO) and wholly owned by Barnsley Metropolitan Borough Council. Berneslai Homes is a company limited by guarantee and is overseen by a Board of Directors. The implementation of policies and the day to day running of Berneslai Homes is delegated to the Chief Executive and the Executive Management Team.

Our Operational Scope

Berneslai Homes manages approximately 18,000 homes on behalf of tenants and Barnsley Metropolitan Borough Council.

Due Diligence Processes

Procurement Practices and our Supply Chain

Our Procurement Strategy includes reference to modern slavery and human trafficking. We require new suppliers to declare that they are not involved in slavery or human trafficking and are fully compliant with the Modern Slavery Act 2015.

Our central Procurement Team supports the business to provide a robust framework for procurement activities and contract management. Our team work closely across the business to ensure we comply with legislation including the Procurement Act 2023.

Berneslai Homes works with a wide range of different suppliers and partners, details of which are published via the contracts register on our website. Our supply chains include suppliers of building materials, Agency staff, ICT and other office equipment, professional services, office cleaning and other office facilities services. Our contractors and suppliers are predominantly UK based.

We have highlighted that there are some areas of our operations that are more vulnerable to modern slavery than others, particularly regarding suppliers and sub-contractors for repairs and maintenance. Our standard terms and conditions for the procurement of goods and services include Modern Slavery Act provisions,

safeguarding and the legal and ethical requirements in this area. Specific procedures to mitigate the risks includes requiring subcontractors to undertake DBS checks on their staff, site cards which relates to their recruitment practices, and discussions around safeguarding. For supply of goods, we request confirmation that goods are sourced responsibly.

During 2024-25, we reviewed our supplier code of conduct to ensure it remains fit-for-purpose. The code of conduct sets out our expectations from subcontractors with regards to Modern slavery, Equality, Diversity and Inclusion and safeguarding. It also sets out how they can report any concerns to us. We continue to include our supplier and contractor code of conduct in our tender documents so that all our potential suppliers and subcontractors sign up to our commitment to reduce Modern Slavery in our supply chains.

We continue to use the Cabinet Office Procurement Specific Questionnaire (PSQ) to ensure that Suppliers share the right information when participating in procurement activities - Tackling Modern Slavery in Supply Chains (PPN 009).

Tenants

We have tenancy verification checks in place for sign-ups and undertake a number of operational activities where possible signs of slavery and human trafficking could be highlighted. These include:

- Financial inclusion and tenancy support delivered by our Tenants First Team.
- Neighbourhood management with area-based Officers, resulting in our officers knowing a large number of tenants.
- Collaborative working with BMBC Corporate Assurance.
- Annual advertised estate inspections where we might notice anything indicating modern slavery, and residents can attend and often report issues.

We have an embedded Vulnerability Protocol “Something Doesn’t Look Right” across the organisation where staff and contractors can raise any concerns to our Neighbourhood Teams.

Key policies to prevent modern slavery and human trafficking

Employees

Recruitment and selection policies play a crucial role in preventing modern slavery by ensuring ethical and legal employment practices, to avoid unknowingly employing individuals who are victims of forced labour, human trafficking, or other forms of exploitation. Our Recruitment and Selection Policy contains relevant requirements in terms of checking of eligibility (Right to Work checks that meet Home Office guidance) to work in the UK and carrying out of necessary checks such as Disclosure and Barring Service (DBS) on relevant employees, including agency and temporary employees.

References are requested on all employees, and this includes asking referees for any concerns about the applicant working with vulnerable people or children.

Salaries are in line with the Living Wage.

Agencies that we use as part of our recruitment process have procedures to prevent modern slavery.

We have a whistleblowing policy in place which, whilst not specifically focusing on human trafficking and modern slavery, sets out the process concerned employees, Board members and tenants can use to report any concerns of wrongdoing involving the organisation or its staff.

Tenants

Our opposition to modern slavery and human trafficking is recognised in our Vulnerability Protocol. This is also incorporated in our mandatory safeguarding training.

Concerns can be raised by an employee or contractor (usually by email) if they have concerns about a tenant i.e. "something doesn't look right".

We adopt the Council's Safeguarding Children and Adult Policies and work in partnership with them, including referrals. Safeguarding policies which are designed to protect children and adults who are at risk of abuse, neglect, or harm from others. Barnsley Council have ensured their safeguarding policies clearly outline their commitment to how they will meet their statutory duties and obligations including individuals involved in modern slavery/human trafficking. This includes exploring if a referral will be needed to safeguarding teams should a potential case of modern slavery be identified.

As part of our vulnerability protocol around safeguarding, we ask our staff to look for telltale signs of potential issues. There are several ways their concerns can be reported including completing our 'something doesn't look right' form and email.

Tenancy and Neighbourhood Management Policy

The Policy provides a framework to ensure tenants are supported by identifying early signs of vulnerability in line with the company's Vulnerability Strategy,

- There is a comprehensive training program for our customer facing officers which includes the 'Something doesn't look right' training so they are able to identify signs of vulnerability and know what action to take.
- Participating in Local Safeguarding Partnerships / Boards and subgroups.

Assessment of Risk within our organisation

Barneslai Homes operates a wide number of activities in delivering neighbourhood and property maintenance services. Some of our supplier's subcontract work or rely on recruitment agencies to supply temporary or permanent staff and is therefore a high-risk area. By the nature of their businesses, some of our suppliers are potentially at higher risk than others:

- maintenance,
- repairs
- and waste recycling.

Our contracts have equality, diversity and inclusion and modern slavery sections contained within them. As part of our contract management responsibilities, if a potential risk is identified any concerns will be reported and may result in termination of the supplier's contract.

Annually, we remind our staff of the Modern Slavery Act 2015, including the definitions of slavery and human trafficking.

During 2025-26 we will:

- Continue ongoing supplier engagement and improving our contract management procedures, including site visits by managers
- Continue to raise awareness with our staff through internal communications.
- Support and promote the national modern slavery website and helpline to the public: <https://www.modernslaveryhelpline.org/> 0800 0121 700 via our website and social media platforms.
- We will publish our statement to the government registry <https://modern-slavery-statement-registry.service.gov.uk/>

Effectiveness

The effectiveness of our policies and procedures will be monitored and any areas of concern addressed. We will continue to be vigilant to the risk of modern slavery.

Declaration

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Berneslai Homes' modern slavery and human trafficking statement for the financial year ending 31st March 2025, as approved by the Board in September 2025.

Signed on the Board's behalf, by:



Chair of Berneslai Homes Board