

# **Modern Slavery Act 2015**

## **Modern Slavery and Human Trafficking Statement for Financial Year Ending 31<sup>st</sup> March 2024**

**Approved by the Advance Northumberland Board on 24<sup>th</sup> February 2023**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery and forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Advance Northumberland is committed to ensuring that our ethical practices to combat slavery and human trafficking are followed throughout our supply chains. 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 2024.

### **1. Organisation Structure and Supply Chain**

Advance Northumberland is group of companies engaged in real estate development and economic regeneration and is wholly owned by Northumberland County Council.

The companies which comprise the Advance Northumberland Group are Advance Northumberland Limited, Advance Northumberland (Housing) Limited, Advance Northumberland (Commercial) Limited, Advance Northumberland (Developments) Limited, and Advance Northumberland (Financial) Limited.

We manage around 1250 rented residential properties and 750 commercial units primarily within Northumberland, as well as providing a wide range of services delivered directly by the Group or through external contractors with a large and diverse supply chain.

Advance Northumberland currently employs over 150 staff in full and part time contracts.

### **2. Policies**

Advance Northumberland has a range of policies and processes which reflect its commitment to acting ethically and with integrity to prevent slavery and human trafficking in its operations. These include:

#### **2.1 Code of Conduct**

All employees must be clear about the standards of conduct which are expected of them whilst employed by Advance Northumberland. The policy provides a

guide to managers and employees on what Advance Northumberland considers appropriate in relation to conduct.

The role of employees is to serve the Group in providing advice, implementing its policies, and delivering services to the local community. In performing their duties, they must act with integrity, honesty, impartiality and objectivity and comply with policies relating to equality and diversity in addition to the requirements of the law.

## **2.2 Dignity at Work**

Advance Northumberland has a positive approach through this policy to stress the intention to engender an open culture based upon mutual respect.

Advance Northumberland's Dignity at Work Policy has a positive approach, stressing the Company's intention to engender an open culture based upon mutual respect. Advance Northumberland seeks to create a healthy work environment in which all individuals are given the dignity and respect to which they are entitled. The Dignity at Work Policy does not just apply to the actions of employees whilst at work but also outside of work.

## **2.3 Equality and Diversity in Employment**

The Group aims to support a society in Northumberland which embraces the diversity of the whole community, where unjustifiable discrimination or prejudice does not exist and where all individuals are treated with courtesy, dignity and fairness including in the provision of services and employment.

## **2.4 Procurement Policy**

As Advance Northumberland is a wholly owned subsidiary of Northumberland County Council, it is subject to the public sector procurement legal framework and its overarching principles which are:

- Equality of treatment
- Transparency
- Mutual Recognition
- Proportionality

## **2.5 Standards of Business Conduct and Ethical Standards**

Advance Northumberland is classed as 'publicly owned' due to its parent being Northumberland County Council. The Group must therefore comply with the Nolan Committee principles of good governance which require Directors and Employees of the Group not to place themselves under financial or other obligation to outside individuals or other organisations which might influence them in the performance of their duties.

The Group is committed to ensuring adherence to the highest legal and ethical standards and will seek to conduct business in an honest manner. This is not just a cultural commitment by Advance Northumberland but is also a moral issue and a legal requirement.

## **2.6 Whistleblowing Policy**

Advance Northumberland insists on honesty, integrity, inclusion, diversity, equity and fairness in all aspects of its business and expects the highest standards of professionalism and ethical conduct to be maintained in all its activities. The Group expects the same in its relationships with all those with whom it does business.

Pursuant to this, Advance Northumberland promotes a culture of openness and accountability. The objectives of the Whistleblowing Policy are as follows:

- To encourage employees to report suspected wrongdoing as soon as possible, with the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be protected wherever possible
- To provide employees with guidance as to how to raise those concerns
- To reassure employees that they are able to raise genuine concerns in good faith in the Public Interest without fear of reprisals, even if they turn out to be mistaken.

All workers working have a contractual right and duty to raise genuine concerns they have with their employer about malpractice, financial impropriety, bribery or any other serious risks they consider to be in the public interest.

## **3. Due Diligence and Risk Assessment**

Advance Northumberland undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. Due diligence includes:

- Contractor performance reviews to improve substandard suppliers' practices and monitoring of agreed actions
- Invoking sanctions against suppliers that either fail to improve performance or seriously violate conditions of contract including the termination of the business relationship
- Development of a Standard Selection Questionnaire (SQ) which includes the requirement for supplier disclosure of any offence under the Mandatory Exclusion Grounds and also required confirmation of compliance with reporting requirements under Section 54 of the Modern Slavery Act 2015.

## **4. Risk Assessment and Management**



Advance Northumberland will evaluate the principal risks related to slavery and human trafficking and will identify the areas to be addressed to produce an action plan.

#### **5. Training and Awareness-raising**

Advance Northumberland will ensure all staff have an awareness of the Act through training going forward.

Signed



J Reid

Chair

Advance Board of Directors

Dated 24.02.2023