

The Modern Slavery Statement

The Modern Slavery Act 2015 (the Act) requires organisations supplying goods or services with a turnover of above £36 million to prepare and publish an annual Modern Slavery Statement

Who we are

A not for profit organisation and Scottish Charity, we are also a Registered Social Landlord. For over 49 years we have been developing Housing, Care and other Services to enable Scotland's older people to live the life they want. Our brand promise is 'Free to be' - it sums up our firm belief that older people should have the freedom to make their own choices and be free to live as independently as possible. A promise which, thanks to the experience, dedication and passion of our staff and volunteers, we are uniquely placed to bring to life.

What we do

Bield is one of the largest providers of Housing and support services for older people, managing over 5,400 properties across Scotland. This includes retirement housing, retirement housing with meals, retirement plus housing, shared ownership and care services. Bield also provides a range of other services including maintenance, factoring and a call receiving centre (BR24). We employ around 700 employees, 200 casual workers and have a network of approximately 160 dedicated volunteers.

Our policies and procedures

We continue to review our existing policies and procedures in light of the Act each year. We are confident that our policies promote good behaviour among our colleagues at work and within our supply chain. Our policies and procedures are kept under review to make sure that they reflect Bield's evolution and our regulatory and statutory obligations. We have a number of policies and procedures in place that contribute to ensuring modern slavery does not occur in our business or supply chain which includes:

- Employee Code of Conduct
- Dignity at Work Policy
- Equality & Diversity Policy
- Anti Fraud & Bribery Policy
- Health & Safety Policies
- Recruitment Policy
- Right to Work Policy
- Whistleblowing Policy
- Standing Orders
- Financial Regulations
- Procurement Policy and Regulations

Risk Assessment and Management

In addition to our policies, we are taking a number of steps which help detect and prevent slavery and human trafficking. They include:

- We follow the Scottish Government's Fair Working Practice guidance which makes clear how we should structure invitations to tender to ensure that we can gather evidence from potential suppliers to show that they treat their staff fairly
- We pay the Scottish Living Wage as a minimum to all employees
- We meet the requirements of the Asylum and Immigration Act 1996 and ensure that all new employees and casual workers provide original documents (such as a passport) before they start working with us to verify their legal right to work in the UK
- We have a framework agreement in place with employment agencies, which require organisations that supply agency workers to ensure that they also verify the legal right to work in the UK before placing an agency worker within a Bield service
- Strategies on equality and diversity and safeguarding
- A requirement for all staff to adhere to the Code of Conduct which includes requirements in relation to workplace behaviour and equality and diversity
- A whistleblowing policy which protects staff should they raise concerns about issues such as modern slavery
- Tenancy management policies which set out the action to be taken where our properties are used for unlawful purposes
- We have also added a question on modern slavery to our Contractor Assessment Procedure ("Can you confirm that you have procedures in place to combat the risk of modern slavery in line with the Modern Slavery Act 2015")

Our Risk Management Policy outlines how we will identify, assess and mitigate risks to the organisation. The Policy also describes Bield's risk appetite i.e. the level of risk we are willing to accept in pursuit of our objectives.

We have assessed the risk of modern slavery and have concluded that none of our activities are high-risk in this respect. The risk of modern slavery in our supply chain is included within our risk register, which outlines the control measures and mitigating actions that we have established to minimise this risk.

Our supply chain

Our procurement activities take place in Scotland and our contractors and suppliers are predominantly UK and EU-based. We strive to ensure our suppliers share our values on modern slavery and also carry out their own due diligence on their own supply chains to limit the risk of modern slavery taking place.

We have included a Modern Slavery clause in our framework agreement for maintenance contractors. The clause describes the obligations upon any contractor employed by Bield under the framework in terms of addressing the Act.

Due Diligence

We strive to make sure that when we purchase goods and services we comply with all relevant laws and conduct ourselves in an open, honest and ethical manner.

We carry out checks on our suppliers through pre-qualification questionnaires and/or tender documents. In doing so, we exclude any unsuitable companies. Once we engage a supplier, we make sure they have policies which are similar to ours and match our overall values.

Training

All staff are required to complete training on modern slavery on joining Bield. An assessment is undertaken of the level of awareness of the Modern Slavery Act for staff involved in supply chain and service provision.

We recognise the need to raise awareness across the workforce and will take reasonable steps to develop relevant training and a Modern Slavery Act Guidance document.

Bield, therefore, believes that to the best of its knowledge, its suppliers do not engage in illegal slavery or human trafficking.

KPIs

We recognise that KPIs might potentially act as an unintended incentive to modern slavery. Although the risk is low, we need to bear in mind the impact that our KPIs might have on modern slavery in our supply chain in particular. We use a range of indicators to monitor the cost of our services with the aim of keeping costs to the most economically advantageous level to ensure that our customers receive value for money. Modern slavery could potentially help contractors to achieve these aims; however, the controls we have established (as described elsewhere in this statement) ought to minimise this risk.

Three KPI's have been developed and will be monitored.

1. On joining Bield all staff are required to complete training on modern slavery.
2. All potential suppliers will be evaluated before entering the supply chain.
3. An assessment is undertaken of the level of awareness of the Modern Slavery Act for staff involved in supply chain and service provision.

We routinely monitor and report on any complaints that we receive. During 2019/20 we did not receive any complaints regarding modern slavery.

Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Bield's slavery and human trafficking statement.

Approved by the Board of Management of Bield Housing and Care on 02/07/2020.

Signature

Date

Lynne Douglas
Chief Executive