



Modern Slavery Statement 2025

Approved 11/06/2025





Bield Modern Slavery Statement

Introduction

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.

Bield Housing and Care meets the requirements set out in the Act including preparing and publishing a Modern Slavery Statement, which is set out below.

Who we are

Bield Housing and Care is a housing organisation and Scottish Charity operating in 23 local authority areas across Scotland. We have around 160 housing developments and provide housing and services to around 5,400 customers.

Bield Housing & Care are a not-for-profit organisation and Scottish Charity. We are also a Registered Social Landlord. As one of the largest providers of housing and support services for older people in Scotland, we own or part own over 4,600 properties.

Our purpose is ***to make it possible for more people to live their best lives, at home, surrounded by a supportive community***, with our vision a new, aspirational future where: ***we lead, set and deliver the global standard for ageing at home.***

Our values include:

Honesty
Dignity

Equality and Diversity
Integrity

Ambition
Caring

Kindness

What we do

Bield is one of the largest providers of Housing and support services for older people, managing over 4,600 properties across Scotland.

Our services include:

- Retirement housing
- Retirement housing with meals
- Retirement plus housing
- Shared ownership
- Care services
- Bield's Independent Living Approach provides a cost-effective, scalable model of early intervention – offering the right housing, support and community connections to help older people live well in their own homes



Bield also provides a range of other services including maintenance and a call receiving centre (BR24). We employ around 700 employees and 200 casual workers.

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 positive and compliant 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 any changes to Bield's strategic direction and / or 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
- Whistleblowing Policy
- Dignity at Work Policy
- Equality & Diversity Policy
- Anti-Fraud & Bribery Policy
- Health & Safety Policies
- Recruitment and Selection 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 our potential suppliers can evidence that they treat their staff fairly.
- We are committed to the principles and effective implementation of Fair Work First which extends to every member of our staff team throughout their entire employment journey. We achieve this commitment by continuously reviewing and enhancing our work processes, ensuring that our policies mirror our commitment to the principles of Fair Work First. This includes ensuring that we pay the Scottish Living Wage as a minimum to all employees and workers.
- We are an equal opportunities employer and committed to having in place fair, effective and transparent approaches to recruitment and selection. All applicants are considered solely based on their ability to do the job. Our recruitment and selection policy ensures that we are compliant with relevant UK legislation with regards to checking eligibility to work in the UK and other required background checks.
- We have a framework agreement in place with employment agencies, which require organisations that supply agency workers to ensure the same



compliance with UK legislation in relation to checking eligibility to work in the UK and obtaining required background checks before an agency worker can be placed within a Bield service.

- Our Code of Conduct and alignment with SSSC Code of Practice for Social Service Workers makes clear to our employees the standards and behaviours expected of them when fulfilling their roles. We work closely with our employees to ensure the highest standards of conduct and ethical practice across all activities.
- Strategies on Equality Diversity and Inclusion, and Safeguarding.
- 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.
- A specific section on modern slavery within 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”).

In line with our Board Assurance and Risk Management Policy we have assessed the risk of modern slavery occurring within Bield, concluding that none of our activities are high-risk in this respect.

Our supply chain

Our procurement activities take place in Scotland with our contractors and suppliers 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 a Modern Slavery clause in our standard agreements for 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 about modern slavery on joining Bield and to refresh their knowledge each year. The training provides employees across Bield with knowledge and understanding in relation to:



- The Modern Slavery Act and how this relates to the responsibilities of their role.
- Recognising and assessing the signs and indicators of modern slavery and/or human trafficking.
- Understanding how to raise concerns about suspected or reported Modern Slavery and/or human slavery internally and externally and the support available.

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 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 2024/25 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 Bield Housing and Care on 11 June 2025.