

Bernicia's Slavery and Human Trafficking Statement September 2025

This statement is made pursuant to Part 6 Section 54 of the Modern Slavery Act 2015.

In the last 12 months we have—

- Raised awareness about Modern Slavery by:
 - Continuing to publish our slavery and human trafficking statement externally.
 - Providing a leaflet and information for tenants, entitled “Stop Abuse” which refers to Modern Slavery and lists the action that people can take if they suspect it is taking place or that they are a victim.
- Continued to review group supplier, contractor and consultant lists in line with compliance to the Modern Slavery Act and information provided by the Global Slavery Index.
- Continued to include selection criteria in tenders which include the use of the Cabinet Office's standard selection questionnaire which target questions of slavery and human trafficking risks.
- Continued to include reference to modern slavery and human trafficking in our procurement documents including procurement policy, terms and conditions and code of practice for contractors.
- Continued to communicate Bernicia's standards to our suppliers, contractors and consultants who are expected to maintain the same standards. As part of this we request all existing and new suppliers and contractors to sign a statutory declaration conveying their understanding of the organisations approach to modern slavery in the supply chain.
- Continued to hold information on suppliers, contractors and consultant's equity, diversity and inclusion policies and statements.
- Introduced the process of writing to suppliers, contractors and consultants in potentially higher risk categories to check what assurance arrangements they have in place.
- Strengthened the knowledge and skills of the procurement team by completing the training on Modern Slavery through Engage.
- Continued to ensure our colleagues understand the potential risks of modern slavery and human trafficking in delivering our services via diversity and safeguarding training which includes making colleagues aware of the Modern

Slavery Act 2015 which includes definitions of slavery and human trafficking and via safeguarding policies and procedures.

- Continued when recruiting new colleagues to ensure that all prospective employees are legally entitled to work in the UK via sight of an original document confirming this right prior to an offer of employment being made. A copy of the document or a detailed record of it is retained on file. The Human Resources GDPR information asset register and recruitment guidance has been up-dated to include a statement as to why the information is collected.
- Continued to sign up new tenants using the following precautionary measures:
 - It is a condition of the tenancy agreement that tenanted' properties remain occupied by the legal tenant and are not used for "criminal, illegal or immoral activity", including slavery. Bernicia's Housing Management monitor and make sure occupancy is by the stated legal tenant and there are checks in place to ensure they have the right to take the tenancy.
 - Photographs of new tenants are taken or obtained from the tenant so that identification can be confirmed at any time during the tenancy.
 - Unannounced or arranged calls are made at the commencement of new tenancies (after the first arranged visit) to ensure the right person is in the property.
 - Via safeguarding training, housing colleagues are made aware of the signs of criminal activity, including modern slavery so that if necessary, action can be taken.
- Contacted our current suppliers who provide us with temporary colleagues to ensure they also comply with the Modern Slavery Act.
- Implemented procedures for non-compliance with the Act by tenants under the terms of their tenancy agreement.
- Communicated with residents and leaseholders to make them aware of the Modern Slavery Act 2015, including the definitions of slavery and human trafficking.
 - Residents will be made aware of the Modern Slavery Act via articles on our website and in resident newsletters.
 - Leaseholders will be made aware by inclusion of information in guides, service charge invoices and statements, annual reports, newsletters and on our website.

Bernicia Group

As a Group we own and manage over 14,000 properties and provide homes and services to over 60,000 residents in the North East.

We build, manage and maintain social housing across a wide range of property types and tenures, we provide a raft of services to maintain quality homes and estates, to support residents, promote independence and respect people as individuals.

Our commercial subsidiary, Kingston, is a profit for purpose company providing leasehold block and open spaces management and through its estate agency, Living Spaces, it provides sales and private rented services to a wide range of customers.

Our commercial subsidiary gift aids their surplus to Bernicia which funds our charitable Bernicia Foundation to provide additional support to strengthen communities and support individuals.

Our strategy 2022-26, sees us investing over £200 million in new and existing homes.

Underpinning everything we do is our vision, mission and values.

Vision – Housing People, Helping People:

We believe a good home makes lots of other things possible, so we provide great homes and services that do just that. We are “housing people” – professional and passionate about what we do.

Mission – Investing in homes, services and people to make a positive impact on the communities of the North East:

We will invest to provide quality new and existing homes, in the provision of services that respond to our tenants, customers and market place requirements, and in our people and the communities within which we operate. **We will invest in the North East.**

Our Values – The Bernicia Way:

We value our customers, work together, respect each other and have the highest levels of accountability and integrity. We deliver what we say we will do, something that our tenants, customers and partners can rely upon.

Our Values



Customer Focused

Because we care about our customers, how we do things is as important to us as what we do. We understand our customers and deliver great customer service



Teamwork

We work together, across boundaries, to meet the needs of our customers and help the organisation to be successful.



Integrity

We uphold the highest standards of integrity in all of our actions.



Respect for our People

We value our people, encourage their development and reward their performance.



Leadership

We provide strong corporate governance and leadership which is outcome-focused.



Accountability

We are personally accountable for delivering on our commitments.

Modern Slavery Act 2015

The modern slavery act 2015 aligns with Bernicia's integrity value on building trust through open, honest, ethical behaviour, acting with respect for others, behaving as responsible members of local communities.

Bernicia does not wish to support or deal with any business knowingly involved in slavery or human trafficking in any part of its operations.

Bernicia is committed to working with partners, contractors, suppliers and other stakeholders to understand the risks to the supply chain and implement systems and processes to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Bernicia manage procurement from a wide range of partners, suppliers and contractors via a varied supply chain including construction, repairs and maintenance, facilities management, building materials, office supplies, I.T services, recruitment, professional services, utilities, catering and cleaning.

Bernicia is aware that modern slavery and human trafficking is at risk throughout the supply chain and high risks for Bernicia which may exist are suppliers and service providers of repair and maintenance, recruitment agencies and construction contractors.

Over the next 12 months, to gain a further understanding of high-risk areas, provide more clarity in our processes and mitigate risks, Bernicia will endeavor to take positive action and undertake the following:

- Continue to review internal policies where reference to the Modern Slavery Act is required e.g. housing policies and safeguarding.
- Procurement Team to review and update the e-learning course - Ethical Procurement and Supply to reflect the requirements of the Procurement Act 2025.
- Continue to increase our colleague understanding of the potential risks of modern slavery and human trafficking via our equity, diversity and inclusion and safeguarding training.
- Provide wider visibility to the business of suppliers, contractors and consultants adherence to the Modern Slavery Act 2015.
- Use a risk matrix for suppliers, contractors and consultants to use a risk-based approach to modern slavery in the supply chain.
- Continue to review procurement policies and procedures to ensure they reflect Group's development and our regulatory and statutory obligations.

The Director of Corporate Governance will take lead responsibility for the development and implementation of anti-slavery initiatives.

This statement has been approved by the Bernicia Board and will be reviewed and updated annually.