Broadland Housing Association
Modern Slavery and Human Trafficking Statement

Introduction

Broadland Housing Group (Broadland) is alert to the risks of modern slavery and human trafficking and are committed to ensuring that neither exist in our business or in any part of our supply chain.

Modern slavery is defined as slavery, servitude and forced/compulsory labour and human trafficking.

This statement will be reviewed annually by the Board to ensure it reflects our ongoing commitment and any updates to organisational practices or legislative requirements.

Complying with the Modern Slavery Act 2015

Broadland is committed to ensuring compliance with our legal and regulatory responsibilities, including the Modern Slavery Act 2015 (the Act). Section 54 of the Act requires relevant organisations supplying goods or services with a turnover above £36m to prepare and publish an annual Modern Slavery Statement.

As a Living Wage Foundation employer, we are committed to paying the real Living Wage to all our staff and we regularly review our terms of employment to ensure that they comply with all relevant legislation.

In addition, we state in our tender documents that all suppliers must pay the real Living Wage and that if successful they need to provide evidence of this.

Organisation Structure

Broadland is a registered provider of social housing under the Cooperative and Community Benefits Societies Act 2014.

We help families and individuals in housing need across Norfolk and north Suffolk and provide over 5,800 quality homes across this region, improving the lives of over 6,700 tenants and their families. Our primary purpose is to use our resources to provide high-quality affordable homes to those who cannot afford a home without our help. We also provide a range of support services to tenants and vulnerable people across our communities to enhance their life opportunities.

The Affordable Housing Provider (AHP) has three subsidiaries:

- Broadland St Benedicts Limited - private limited company limited by shares engaged in the sale of open market homes.

- Broadland Development Services Limited – private limited company limited by shares engaged in the procurement of new homes development.
- Broadland Meridian - registered charity, limited by guarantee, providing grants to mental health and wellbeing organisations.

Our business model involves undertaking development and delivering landlord services in a way that supports our social purpose.

As a developer, we build affordable homes that are either let at sub-market levels or that offer low-cost home ownership opportunities. We also develop market sale properties and use the proceeds generated from sales to fund both improvements to existing homes and new affordable homes.

In addition to our core activities, Broadland Meridian, our charitable arm, provides funding to charities doing important work in Norfolk and north Suffolk.

For the year ending March 2026, Broadland had a group turnover of £43.4m and employed 229 full-time equivalent staff.

Supply chains
Broadland recognises the potential risk of modern slavery and human trafficking occurring in our supply chains, including the use of workers employed by outside agencies.

We have our own in-house Procurement Team which is responsible for sourcing, on-boarding and management of suppliers which gives us greater influence over their practices.

We have established strong, long-term relationships with predominantly UK-based suppliers: a mix of global market-leading manufacturers and small or medium-sized local businesses. Most of the transactions of our UK-based suppliers are with other UK-based organisations that are subject to the Modern Slavery Act 2015.

Our suppliers and subcontractors are required to comply with our business practices and ethical supply policies. Our site induction processes extend to subcontractors' workers operating on our sites.

Throughout our supply chain and dealing with suppliers, we are committed to learning from areas of best practice to ensure continuous improvement. We will ensure that we continue to comply with current and future legislation and will make sure our practices are reviewed on a regular basis to ensure they remain relevant.

Related policies and documents
The following policies and documents cover employee behaviour and conduct when representing Broadland. Along with a policy which outlines how to raise concerns in relation to Modern Slavery.

Code of Conduct
Contract of Employment
Job Descriptions

Terms and Conditions
Recruitment policy
Speaking Out policy

Due diligence processes to manage risk
Broadland does not wish to work with any supplier involved in slavery or human trafficking in any part of its operations. To mitigate this risk we include statements on Modern Slavery in our tender documentation and state that “we expect our suppliers to comply with the requirements of the Modern Slavery Act 2015 and failure to do so may result in determination of any potential contract”. We also:

- Carry out due diligence and require new suppliers to declare that they are not involved with nor have been subject to an investigation in connection with any offence involving slavery or human trafficking.
- Have provisions in our contract documents requiring our suppliers to take appropriate steps to ensure that there is no slavery or human trafficking in their supply chains.
- Ask all potential suppliers to confirm they are compliant with the annual reporting requirements contained within Section 54 of the Act if they are a relevant organisation.

We will only trade with those suppliers who fully comply with the above and the terms of our contracts.

To support our approach to our supply chain we also have a confidential reporting policy under which employees can raise concerns including those relating to Modern Slavery.

Performance monitoring
Broadland undertake regular contract management review meetings with our key suppliers. As part of this process, we monitor supplier performance against the Five Es of value for money – Economy, Efficiency, Effectiveness, Equity, and Environmental – and compliance with the Modern Slavery Act is included in these conversations under the effectiveness (spending wisely) section.

Recruitment and training
Broadland’s Code of Conduct, Contract of Employment, Job Descriptions and Terms and Conditions documents all outline to employees the actions and behaviours expected of them when representing Broadland.

Broadland’s Recruitment policy outlines the transparent and fair process followed for recruitment activity. Broadland does not rely on recruitment agencies for recruitment, meaning pay and hours are determined in accordance with standard precedents in the business. Where an employee is employed via a recruitment agency, pay is commensurate with what would have been paid to an employee in a similar role employed by Broadland. Human Resources (HR) manage all recruitment in Broadland so uphold these requirements.

Broadland’s Speaking Out policy encourages all workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of Broadland.

All employees who are involved in managing Broadland's supply chain and procurement activities will be given ongoing training as deemed appropriate.