

## **Peabody Slavery and Anti-Trafficking Statement**

As a responsible employer and business, and as an organisation dedicated to improving the lives of our residents and the communities we serve, Peabody is committed to doing everything we can to prevent slavery and human trafficking.

This statement sets out how we deliver that commitment, understanding and mitigating the risks of slavery or human trafficking taking place within our business or supply chain.

### **Our business**

Peabody was established in 1862 by the American banker and philanthropist, George Peabody. We are one of the oldest and largest housing associations in London with a presence in the majority of London boroughs. We own and manage over 29,000 homes, providing services to over 80,000 Londoners. In 2016/17 Peabody's turnover was around £290m and spent around £230m with third party contractors.

As well as bricks and mortar, we provide community programmes for the benefit of our residents and for people living in the surrounding neighbourhoods, including employment and training support; health and wellbeing projects; family support programmes; welfare benefits advice; and activities for younger and older people. This work aims to tackle poverty at its roots, supporting people to transform their lives and communities for the better.

### **Robust strategies, policies and procedures**

The Group has a number of strategies, policies and procedures in place which help detect and prevent slavery and human trafficking. These cover our workforce, our supply chain and our residents as well as the wider communities we work with across London. They include:

- requirements for all new employees to provide original documents (such as a passport) before their start date to verify their legal right to work in the UK
- induction training for all new employees on equality and diversity; and on the work of the Group's Community Safety and Support Team, which seeks to recognise and work with vulnerable people and safeguard children and vulnerable people in our communities
- strategies and policies on equality and diversity, vulnerability, safeguarding, domestic abuse and violence against women and girls
- specialist training for front-line employees in safeguarding, domestic abuse and violence against women and girls
- the requirement that all employees adhere to Peabody's Code of Conduct which includes provisions against bribery, and requirements in relation to workplace behaviour and equality and diversity
- a whistleblowing policy which protects employees and contractors from negative repercussions if they make a report in good faith about an apparent breach of legislation or Peabody's Code of Conduct, and requires that all such reports will be properly investigated and acted upon, as necessary.

## An engaged workforce

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Peabody regularly reviews its policies and practices to make sure they are compliant with legislation and in line with organisational needs and best practice.

The Code of Conduct was reviewed in 2016/17. The Code applies to Board members, all employees, involved residents, contractors, consultants and agency staff. It is designed to assist employees and others working with Peabody to understand their responsibilities and obligations and provide guidance on expected behaviour in the workplace.

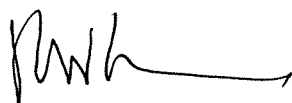
As a housing association and organisation active in community work across London, Peabody is well placed to identify signs of slavery and human trafficking, and as such we place value on the training our front-line employees receive to help them spot issues when going into homes and meeting residents.

### Our supply chain

During the year Peabody contacted over 30 of its key suppliers which we deemed to be potentially the highest risk, for example because of the sector in which they operate. Together these suppliers comprise one third by value of the Group's third party spend. We have set out our requirement that all the Group's suppliers must comply with the provisions of the Modern Slavery Act, and are working with them to understand their compliance arrangements. Any suppliers who were unable to provide the necessary assurance by 24 March 2017 have been alerted that compliance to the Act will be mandatory and assessed as part of any new tender process.

In relation to new suppliers, for any tenders for contracts above the OJEU threshold, compliance with the Modern Slavery Act has been included within the selection process, and any failure to meet this will lead to disqualification of the applicant. For contracts or agreements below these thresholds, standard clauses have been included within Peabody Group's standard terms and conditions seeking assurance from suppliers that they comply.

Peabody is in the process of developing a proforma setting out standard documentation required from bidders on sub-threshold procurements, and this will include provision of appropriate evidence of compliance with the Modern Slavery Act.



Signed: Lord Bob Kerslake

Chair of the Board

Approved by the Board of Peabody on behalf of the Peabody Group on 24 May 2017