



# Co%ownership

**Modern Slavery  
Transparency Statement**  
2018/19

## Introduction

This statement explains the steps taken by Northern Ireland Co-Ownership Housing Association Limited & its subsidiary OwnCo Homes Limited (together “**Co-Ownership**”) to prevent modern slavery pursuant to Section 54 of the Modern Slavery Act 2015.

The term ‘modern slavery’ encompasses a number of crimes related to fundamental breaches of human rights, such as slavery, forced and compulsory labour and human trafficking. It includes any activity that leads to the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. Over 40 million people live in some form of modern slavery worldwide according to the International Labour Organisation, with 25 million of them being victims of forced labour.

## Our Statement

At Co-Ownership, people are at the heart of what we do and we recognise our obligations to combat slavery and human trafficking within our supply chains. We are committed to maintaining best practice, seeking continuous improvement and working in an atmosphere of integrity and professionalism.

As one of the fastest growing areas of crime in the UK, we have a zero-tolerance approach to modern slavery and are committed to acting ethically in all of our business dealings and relationships.

## Our Structure

Co Ownership is a registered housing association and industrial and provident society, regulated and funded by a combination of private finance and the Department for Communities. We have helped over 28,000 people buy a home in Northern Ireland since 1978 and continue to offer flexible housing solutions for our customers.

Our operations are primarily office-based and our supply chain categories support this. Supply categories include office space, office services, IT and technology, professional services and recruitment. We are also required to engage surveyors and legal specialists in order to ensure housing transactions are processed efficiently and accurately, all of whom are regulated by the relevant authorities and subject to due diligence and service level agreements.

As our base and operations are currently limited to Northern Ireland, the entirety of our supply chain is contained within the United Kingdom, limiting the degree of jurisdictional risk arising in respect of modern slavery; nevertheless, we are aware of the presence of

related crimes locally and remain diligent, applying a number of controls to third parties prior to contracting with them.

## **Our Approach**

Co-Ownership has had a long-standing commitment towards ethical, social and environmental responsibility within our business. We comply with all applicable labour laws relating to working terms and conditions, including pay, and we place great emphasis on equality and diversity.

- Where possible we build long standing relationships with a range of local suppliers and make clear our expectations of business behaviour.
- We have a dedicated procurement function to ensure we apply proportionate due diligence to any third party that we engage with.
- Where a company declares a conviction relating to modern slavery they will be excluded from a tender competition, and we have contractual frameworks that communicate our requirements for operating ethically and with integrity in all of our functions to third parties. In order to ensure appropriate oversight over the small number of companies that we are engaged with, we maintain a register detailing these relationships where they are valued at £2,000 or greater.
- We have confidential reporting processes in place to augment our standard lines of reporting for any employee who feels uncomfortable raising issues relating to sensitive topics, such as modern slavery, with their line manager.
- We have designed and operate procurement policies and guidelines which reflect the Public Contracts Regulations 2015.

In all areas, we seek to partner with suppliers that share our values, and we expect our supply chain to operate fair and equitable prices, whereby modern slavery is not tolerated.

Approved by the Board of Directors of Co-Ownership on **15 January 2019**.

## **Signed**



**Sid McDowell**

Chairman, Co-Ownership Housing Association Limited

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