



MODERN SLAVERY
COMPLIANCE
STATEMENT 2019

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2019.

Modern slavery is a crime and a violation of human rights. It takes various forms, including slavery, servitude, compulsory labour and human trafficking for exploitation and can have a significant adverse impact on individuals, families and communities across the world.

Organisation structure

Longhurst Group undertakes a range of community and social activities, including housing, regeneration, community development and care and support services. We employ over 1,300 colleagues and operate in more than 50 local authority areas across the Midlands and East of England. We own and manage more than 23,000 homes and our annual turnover is £160m.

Compliance

The Group has a zero-tolerance approach to modern slavery. Our modern slavery policy is communicated to all employees, volunteers, apprentices, suppliers, contractors and business partners.

The Group Board and Executive Leadership team have overall responsibility for ensuring Longhurst Group complies with our legal and ethical obligations and that our policy is implemented effectively.

Our key area of risk lies in our relationships with our supply chains – suppliers, contractors and business partners. However, we also recognise our responsibilities as an employer of over 1,300 permanent, reserve and temporary colleagues.

Line managers are responsible for engaging with their teams to implement and maintain the processes in place, ensuring all colleagues are informed on and trained in their responsibilities and applying this to their work in accordance with the policy and procedures.

At the heart of the Group is a shared vision for improving lives, which is reinforced by current policies and processes, ensuring that practices throughout the Group remain ethical, transparent and accountable.

As a supplier of services to individuals and communities, we recognise slavery and human trafficking as a potential risk. In addition to our modern slavery policy, we also seek to address this risk through the Group's relating policies:

- ▶ whistleblowing policy
- ▶ grievance policy
- ▶ disciplinary policy
- ▶ performance improvement policy
- ▶ recruitment policy
- ▶ procurement policy
- ▶ safeguarding policy

How we manage the risks

Supply chain

The Group already looks to mitigate its exposure to modern slavery through its standard supplier terms and conditions, which include obligations on suppliers to comply with the Modern Slavery Act. The organisations procurement policy promotes an awareness of modern slavery to colleagues.

Over the coming year the Group will bolster its approach to preventing modern slavery in our supply chains through reviewing our procurement approach in the following priority areas:

- ▶ Categories and suppliers with a high percentage of lower paid; unskilled; temporary; migrant or agency labour
- ▶ Identifying categories and suppliers where the supply chain extends beyond the UK, better understanding the Group's exposure to high risk countries
- ▶ Our strategic suppliers and partners.

We will endeavour to prevent modern slavery in our supply chains. However, if we discover poor practice, we will work with our suppliers and partners to address this. Our belief is that educating and working with our supply chains to enable them to learn, identify poor practice and take action autonomously is ultimately the best approach for eradicating modern slavery.

Our colleagues

Colleagues are required to avoid any activity that might lead to, or suggest, a breach of this policy. Colleagues will be encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our organisation or supply chains at the earliest possible stage.

Disclosure can be made to an appropriate person under the whistleblowing policy or alternatively contact can be made with the Group's External Financial Auditors or Public Concern at Work.

All Longhurst Group policies emphasise our commitment to dignity at work and fair treatment of all colleagues. We are in the process of reviewing our Safeguarding and Whistleblowing policies and Code of Conduct

to ensure they are compliant with the Modern Slavery Act 2015.

Training and awareness

To ensure the risks of modern slavery and human trafficking in our supply chains and our business are understood, we include a training session on modern slavery in our induction for all new colleagues. Our modern slavery policy has been made available to colleagues to ensure awareness and is available on our internal and external website.

Next steps

Following a review of the effectiveness of the policy, we intend to take the following steps:

- ▶ We continue to use our risk management systems and framework to manage this area
- ▶ Undertake an further review of the agencies used in recruitment for both the Housing and Care and Support areas of the business
- ▶ Continue to encourage, support and provide training and awareness to all employees on our modern slavery policy.

Conclusion

We are proud of the steps we have taken to combat any risk of modern slavery and human trafficking being present within our business and supply chains. We will continue to be vigilant and we remain committed to improving our practices further in this area in future years.

This statement has been approved by Longhurst Group Board on 25 July 2019.



Julie Doyle

Chief Executive

Date: 18 September 2019



Longhurst Group
50 Newhall Hill
Birmingham
West Midlands B1 3JN

 **0300 123 1745**

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