



MODERN SLAVERY
COMPLIANCE
STATEMENT 2020

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 2020.

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 operate in more than 50 local authority areas across the Midlands and East of England, we own and manage over 23,000 homes. We are a charitable Housing Association registered as a community benefit society and registered with the Regulator of Social Housing. We employ almost 1,300 staff, 10 office bases and over 80 care and support locations. Our annual turnover is £153.8m.

Supply Chain

The Group recognise that our greatest risk to modern slavery lies within our supply chain, namely where we rely on services provided and are required as part of our day to day business operations:

- ▶ Security
- ▶ Cleaning
- ▶ Catering
- ▶ Care and support
- ▶ Maintenance
- ▶ IT
- ▶ Temporary agency staff
- ▶ Construction

Compliance

The Group has a zero-tolerance approach to modern slavery. Our Modern Slavery Policy is communicated to all colleagues, volunteers, apprentices, by way of our policy management system. Suppliers, contractors and business partners are provided with our Code of Conduct to which there is an expectation and obligation at the point of contract that the Code is adhered to.

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.

At an operational level, line managers are responsible for engaging with their teams to implement and maintain the processes in place, ensuring all staff members are informed and trained concerning 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 remains 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 related policies:

- ▶ Whistleblowing Policy
- ▶ Grievance Policy
- ▶ Disciplinary Policy
- ▶ Performance Improvement Policy
- ▶ Recruitment and Selection Policy
- ▶ Procurement Policy
- ▶ Safeguarding Policy

Our policies are continuously reviewed, enabling gaps to be identified and updated should this be required, supporting the Group's efforts to highlight and reduce the risk.

How we manage the risks

Due diligence in the supply chain

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

Over the coming year the Procurement Team will bolster its approach to preventing modern day 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 mitigate modern day slavery in our supply chains, however where unethical practice comes to light, we will take the appropriate action to report and remedy them. We believe that being transparent and openly acknowledging the existing risk we can achieve greater visibility along the supply chain and address those risks.

As part of this process the Group has created an audit tool shared with our suppliers in a move to ascertain assurances that the principles of the Act are being followed and adopted by our suppliers. This work to reinforce confidence for our stakeholders that the personal welfare of all is also a paramount concern for our organisation. The audit will be an ongoing exercise as way to improve not only our working relationships, but to enable a joint effort around problem solving.

If we discover poor practice in any area 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 day slavery.

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 procedure 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 previously reported that our Safeguarding and Whistleblowing policies were in the review process. We are able to confirm that this process as successfully completed and updated policy's made available to colleagues via our internal processes.

As part of the recruitment process in the coming year, the Group will be looking at implementing the Agency Module on Networx, which will mean going forward anyone wishing to recruit to a difficult to fill role we will have a preferred supplier list. We are working to establish a foundation, which can be built upon as we go forward.

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 staff.

Our Modern Slavery Policy has been made available to staff to ensure awareness and is available on our internal and external website. Additionally, the Group provides a mandatory e-learning module to be completed by all employees.

The Group's supplier audit has been informed by information collated from the relevant areas within the business. In this way we are able to identify those colleagues throughout the organisation who are responsible for hiring/contracting support staff using the many platforms and resources available such as employment agencies.

Subsequently, this has created an opportunity for the Group to prepare a targeted training programme for those colleagues who have this responsibility with a view to that knowledge being shared within their teams.

Our customer forums are one of the ways we engage with our communities. The Group seeks to have modern slavery training and awareness as a standard training session within their training programme, highlighting this as a concern for everyone.

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
- ▶ Review the outcomes of the supplier audit and take remedial action where required
- ▶ Continue to encourage and support awareness amongst colleagues, suppliers, partners and the communities in which we operate on our Modern Slavery Policy.
- ▶ Continue to encourage, support and provide training and awareness to all employees on our Modern Slavery Policy

Conclusion

As an organisation we continue to work together to tackle the risk of Modern Slavery, to date having taken steps to ensure that we are continuously working to improve our efforts to reduce the risk of modern slavery and human trafficking being present within our business and supply chains. We recognise that this effort will be a joint one and appreciate the commitment so far of all involved. We will continue to seek ways in which to reduce this risk, taking effective action where non-compliance is identified.

This statement has been approved by Longhurst Group Board on 4 June 2020.



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Chief Executive

Date: 10 June 2020



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