



MODERN SLAVERY  
COMPLIANCE  
STATEMENT 2021

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## 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 2021.

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 23,500 homes. We are a charitable Housing Association registered as a community benefit society and registered with the Regulator of Social Housing and Care Quality Commission. We employ almost 1,300 staff, with multiple office bases and over 80 care and support locations. Our annual turnover is £152m.

## Supply Chain

The Group recognises that our greatest risk of 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:

- ▶ Care and support
- ▶ Construction
- ▶ Maintenance
- ▶ IT
- ▶ Temporary agency staff – including security personnel, cleaning, catering

## 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.

The Group Board and Executive Leadership team have overall responsibility for ensuring the Group complies with its legal and ethical obligations and that its 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 colleagues are informed and trained concerning their responsibilities, and applying this to their work in accordance with the policy and procedures. Additionally, colleagues are made aware that they can report concerns to their line managers and/or other relevant personnel.

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 related policies:

- ▶ Whistleblowing Policy
- ▶ Grievance Policy
- ▶ Disciplinary Policy
- ▶ Performance and Improvement Policy
- ▶ Recruitment and Selection Policy
- ▶ Procurement Policy
- ▶ Safeguarding Adults Policy
- ▶ Safeguarding Children Policy
- ▶ Employee Code of Conduct

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.

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## 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 impact of the Covid-19 pandemic has also seen us look at our processes, given the changes to the way we work.

A detailed procurement system is in place, part of which includes an invitation for suppliers, contractors, and business partners to sign up to our voluntary Supplier Code of Conduct and declare that they are compliant as part of the procurement process and that they will adhere to the code in line with good practice. The Group's Procurement Policy promotes an awareness of modern-day slavery to staff.

Over the last year the Procurement Team has bolstered 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. Where unethical practice becomes known, we will take the appropriate action to report and remedy this. We believe that being transparent and openly acknowledging the existing risk we can achieve greater visibility along the supply chain and address those risks.

The Longhurst Group Procurement Team due diligence process includes an examination of prior steps within the supply chain. This includes an impact assessment enabling the Group to review suppliers' policy statements, undertake supply chain audits and evaluate audits they have undertaken. These processes all form part of assurances for our procurement risk register.

The performance of all Longhurst Group approved suppliers is regularly monitored, with all workers covered by the Group Whistleblowing Policy.

Longhurst Group has developed a supplier due diligence checklist, which has successfully supported the procurement of PPE (Personal Protective Equipment) over the last 12 months. This requires the identification of tiers in the supply chain, and this information is used to evaluate each supplier and their surrounding risks. It is important that this search is not limited to information provided solely by the supplier.

This work to reinforce confidence for our stakeholders prioritises our belief that the personal welfare of all is a paramount concern for the Group, improves our working relationships and enables a joint effort around problem solving.

The Group utilises a tender and service system, which enables both the Group and its suppliers to upload and share documents, including Modern Slavery documents, for further assurance. Additionally, the Group refers to the Modern Slavery statement checker guidance provided by the CIPS.

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 statement. 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. Where any potential victim is identified, the Group will make a referral using the National Referral Mechanism.

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 policies are 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.

### 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 on our internal and external websites. The Group provides a mandatory e-learning module to be completed triannually by all employees.

The supplier checklist has been informed by information collated from the relevant areas within the business. In this way we can identify those colleagues throughout the organisation who are responsible for hiring/contracting support staff using available platforms and resources, such as employment agencies, and ensuring that they are adequately trained to recognise issues, including reporting concerns.

The Group is working to improve outcomes and reduce risk in this area, whilst also working on establishing relevant KPIs against which to measure our progress:

### Supplier engagement

- ▶ Inviting 100 percent of new suppliers to sign up to the voluntary Supplier Code of Conduct
- ▶ Utilising the Supplier Checklist during all new procurements.

### Modern slavery training and awareness

- ▶ 95 percent completion of mandatory annual training for employees

### Next steps

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

- ▶ Invite prospective suppliers to register with our Tendering and Services System.
- ▶ Deliver an internal awareness campaign annually to all employees on how to recognise and report issues.
- ▶ Explore ways in which the Group can raise awareness with the Customer Forum
- ▶ Continue mandatory annual training for our employees
- ▶ Continue to monitor our risk exposure.
- ▶ Continue to review our risk management framework.
- ▶ Implement Group action plans to address risk and actual instances of modern slavery.

### Conclusion

As an organisation we continue to work together to tackle the risk of modern slavery, acknowledging that Covid-19 has changed the way many organisations work, and in response to this we have made an increased effort to ensure the steps we take to engage our suppliers involve robust processes to improve our efforts against the risk of modern slavery and human trafficking. 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 22 July 2021.



### Julie Doyle

Chief Executive

Date: 26 August 2021



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 **[longhurst-group.org.uk](https://www.longhurst-group.org.uk)**

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