



MODERN SLAVERY
COMPLIANCE
STATEMENT 2022

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 2022.

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 45 local authority areas across the Midlands and East of England, and we own and manage over 24,000 homes.

The Group is a charitable Housing Association registered as a community benefit society and registered with the Regulator of Social Housing and Care Quality Commission.

We employ over 1,200 staff across our areas of operation and have over 80 Care and Support locations. Our annual turnover is £156.13m.

Supply Chain

The Group recognises that its greatest risk of modern slavery lies within its supply chain, namely where we rely on services provided to deliver our day-to-day business operations, such as:

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

Compliance

The Group has a zero-tolerance approach to modern slavery. Our Modern Slavery Policy is communicated to all colleagues, volunteers and apprentices as well as Board and Committee Members. 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 appropriately trained. Clear processes are in place for anyone who has any concerns about modern slavery. As a supplier of services to individuals and communities, we recognise slavery and human trafficking as a potential risk to the Group.

In addition to our Modern Slavery policy, we also seek to address this risk through the Group's other policies including:

- ▶ Whistleblowing Policy
- ▶ Grievance Policy
- ▶ Disciplinary Policy
- ▶ Recruitment and Selection Policy
- ▶ Procurement Policy
- ▶ Safeguarding Adults Policy
- ▶ Safeguarding Children Policy
- ▶ Employee Code of Conduct
- ▶ Domestic Abuse Policy
- ▶ Learning and Development Policy
- ▶ Equality, Diversity and Inclusion Policy
- ▶ Governance Standing Orders

How we manage the risks

Longhurst Group is aware that its financial viability, reputation, and Environmental, Social, and Governance (ESG) goals are intrinsically linked to how it manages its procurement and supply chain.

The Group understands that strong procurement and supplier relationship management processes may improve our business performance; this is by acquiring the best value goods and services. Our procurement framework, therefore, is an important part of how the Group prevents modern slavery within its services.

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.

Our robust procurement process includes an invitation for suppliers, contractors, and business partners to sign up to the voluntary Supplier Code of Conduct. The Group's Procurement Policy promotes an awareness of modern-day slavery to all staff. The Procurement Team has also bolstered its approach to preventing modern day slavery in our supply chains through reviewing our procurement approach in the following priority areas:

- ▶ Identifying those suppliers with a high percentage of lower paid, unskilled, temporary migrant or agency labour
- ▶ Identifying suppliers where the supply chain extends beyond the UK
- ▶ Auditing and mapping supply chains for a sample of high risk strategic suppliers and partners
- ▶ Due diligence checks being a standard part of the procurement process.

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.

Longhurst Group has developed a supplier due diligence checklist. This information is used to evaluate each supplier and their associated risks. This search is not limited to information provided solely by the supplier.

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 the fair treatment of colleagues, and policies are available to everyone in the Group. To ensure the risks of modern slavery and human trafficking in our supply chains and our business are understood, all new staff undergo a training session on modern slavery as part of their induction. Our Modern Slavery Policy is available on our internal and external websites. The Group also provides a mandatory e-learning module to be completed triennially by all colleagues.

The supplier checklist enables us to identify those colleagues throughout the organisation who are responsible for hiring and contracting support staff through employment agencies. Again, training is provided to these colleagues to ensure that they can recognise issues or raise concerns.

Next steps

In the next 12 months we intend to take the following steps:

- ▶ Continue to invite prospective suppliers to sign up to the Supplier Code of Conduct.
- ▶ Continue to raise awareness through the business and introduce an annual awareness campaign.
- ▶ Continue mandatory training for all our employees.
- ▶ Continue to monitor our risk exposure.
- ▶ Continue to review our risk management framework.
- ▶ Review, update and implement the internal guidance regarding agency recruitment.
- ▶ Deliver contract management training, including awareness of risks in the supply chain.

As an organisation we continue to work together to tackle the risk of modern slavery. We continue to increase our efforts to engage with suppliers and follow robust processes to tackle the risk of modern slavery and human trafficking.

This statement has been approved by Longhurst Group Board on 20 July 2022.



Julie Doyle
Chief Executive

Date: **20 July 2022**



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

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