



NHG Modern Slavery Statement 2020/21

This is our Modern Slavery statement published in accordance with section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015. It outlines the steps that we will be implementing in the financial year 2020 and our future plans to ensure we continue to address this important issue. This statement covers Notting Hill Genesis and all its legal entities that form part of it.

Background

The acts of human trafficking, forced labour and the exploitation of vulnerable workers are violations of basic human rights and have no place in our business and supply chain. It is estimated that more than 40 million people are victims of modern slavery, including almost 25 million workers trapped in forced labour. Modern slavery is often a hidden crime involving one person denying another person his or her freedom. It includes slavery, servitude, forced and compulsory labour and human trafficking. To tackle these crimes, the Modern Slavery Act 2015 was introduced. The Act consolidates and clarifies modern slavery offences; toughens penalties and prosecution; and introduces greater support and protection for victims. The concept of forced or compulsory labour is most relevant to this guidance. This is because it is the form of modern slavery which suppliers are most likely to come across.

Notting Hill Genesis Approach

Our approach is to understand how and where modern slavery occurs and to continuously review and improve our practices, policies and processes that we have in place to prevent it. In practice, this means:

- Strengthening our supply chain risk assessment process.
- Raising awareness among employees of modern slavery and human trafficking
- Cross sector collaboration to share best practice and gain insight through attending human trafficking and modern slavery forums to gain insight into the current concerns and be abreast of best practices every quarter.
- Review any cases or concerns of modern slavery within our safeguarding committee meetings.

Governance

On 28th May 2019 Notting Hill Genesis became signatory to Modern Slavery Act 2015, to ensure we conduct business to the highest ethical standard, and we continue to align our business practices to the act and any subsequent updates. We make our commitments public and pledge to be a responsible business upholding human rights and employment

standards. We adhere to internationally declared human rights and the fourth principle to eliminate all forms of forced labour and compulsory labour. In addition, we also abide by the universal declaration of human rights, International labour standards and UK living wage.

To ensure best practices and continuous learning we have established a safeguarding committee where we monitor, evaluate and scrutinise our policies, procedures, and business practices. Furthermore, we engage in case reviews and learning to ensure we safeguard the most vulnerable people in our business and supply chain. Our safeguarding committee is chaired by the Group Director of Housing and is represented by directorates from across the business ensuring our business strategy is in line with our modern slavery statement and best practices are adopted.

Business, Organisational Structure and Supply Chain

Notting Hill Genesis is a business providing and developing housing, delivering associated management and maintenance services, and offering housing related support and care. This means we can regularly come in contact with people who may be vulnerable to modern slavery and human trafficking. The risk level of NHG coming in contact with victims of Modern Slavery is moderate; our core contractors within are accredited and have their own charters around Modern Slavery.

Our business is structured as follows.

- Deliver care/support services to our customers including catering services
- Undertake housing management responsibilities, including conducting regular visits in residents' homes
- Construction of new homes
- Maintaining our homes through repairs, cleaning services and other types of servicing
- Deliver the "back office" services necessary to operate a business

We have in the region of 2000 directly employed staff and approximately 2000 suppliers (this figure may change periodically). Our supply chain involves recruitment, supply of goods and services, to support operations of both our commercial and non-commercial operations for more than 60,000 homes. Some of the categories in our supply chain include catering, office supplies, cleaning, information technology, development, responsive repair and sales and marketing.

Our Policies and Procedures

Our values continue to guide our actions and behaviours with clear expectations set out in policies which are available to all employees internally. We are committed to operating in a responsible way and our policies, practices are transparent, inclusive and fair. We have in place several policies that endure standard of practice and due diligence process in the way we operate.

Some of the policies that directly underpin our commitments are:

- Safeguarding Policy
- Procurement Policy
- Recruitment Policy
- Whistleblowing Policy

- Anti-bribery, gifts and hospitality policy
- Anti-money laundering policy
- Gifts and hospitality declaration form
- Equality, Diversity & Inclusion Policy
- Ethical and Sustainable Procurement CIPS
- Contract management toolkit

Our employment policies and processes make sure that all our employees have the appropriate rights to work and are employed in accordance with local employment legislation.

Managing our Supply Chain

We have made an obligation through our previous modern slavery statement to monitor our strategic/core top 100 suppliers – where turnover exceeds £36M*. We check that they have an active modern slavery statement and follow up with business leads where they do not have one in place. Our contracts are written in such a way that if there is breach which includes modern slavery, contracts will be terminated. We also adopt checks when we set new suppliers up for NHG.

Training and Awareness

During the year 2019/20 we have continued to provide advice and guidance to our contract management team from our Safeguarding Lead and Director of Procurement guided by his training at CIPS and ethical and sustainable procurement process, and regular attendance at safeguarding committee meetings. We have also delivered safeguarding training that has incorporated modern slavery and human trafficking content.

Review of 2019

In the last 12 months we had no reported incidents of slavery or trafficking from our employees or suppliers. We continue to collaborate with our supply chain and external organisations to improve our approach to understanding the potential risk of modern slavery in our own supply chains.

What we are emphasising in 2020/21

Activity	Actions	Timeframe
Policy, procedure and process	<ul style="list-style-type: none"> • Review safeguarding policy and incorporate modern slavery • Make modern slavery reporting mechanism accessible. 	Quarter 3
Contract management	<ul style="list-style-type: none"> • We will continue with our annual review of general procurement guidance, processes and any related documentation in line with the Modern Slavery Act. • We will continue to review and update audit/monitoring practices; we will continue to audit our 100 top suppliers. 	Quarter 3
	<ul style="list-style-type: none"> • We will continue to work in partnership with 	Quarter

Victim support	suppliers to resolve issues. <ul style="list-style-type: none"> • Report any identified cases via the national referral mechanism. • We will consider terminating contracts to ensure we uphold our commitment. 	1,2,3,4
Awareness and training	<ul style="list-style-type: none"> • We will be developing modern slavery targeted awareness training for our contract managers and general awareness sessions for all NHG employees. • We will attend external conferences and events to keep abreast of best practices and share information • We will create online resources accessible to all employees and continuous learning and sharing information. 	Quarter 2&3

* Subsidiaries within the group with a turnover of at least £36 million are as follows:

- Notting Hill Home Ownership Limited
- Canonbury Developments Limited
- Genesis Purchasing Limited

This statement has been approved by the NHG Executive Board.