



Modern Slavery Statement 2021

This statement is published in accordance with the [Modern Slavery Act 2015](#) for and on behalf of Notting Hill Genesis and all legal entities that form part of our wider group. For a full list of all our subsidiary organisations, please see our [annual report and financial statements for 2019/20](#).

Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women, or men through the use of force, coercion, abuse of vulnerability, deception, or other means for the purpose of exploitation. It is a crime under the Modern Slavery Act 2015 and includes holding a person in a position of slavery, servitude, forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.

Organisation structure and supply chains

Notting Hill Genesis (NHG) is incorporated in England under the Co-operative and Community Benefit Society Act 2014. We are a registered housing provider as defined by the Housing and Regeneration Act 2008. Our annual turnover exceeds £36 million.

Created in 2018 from two well-established housing associations, we are now one of the largest housing associations in London and its surrounding areas. We own and manage more than 66,000 homes and employ around 2,000 staff. We provide homes across a range of tenures and are committed to continuing to deliver housing that is affordable to all. In addition, we have a significant development programme, which saw us build almost 2,000 new homes in 2019/20.

Our product supply chains, vendors and customers are extensive, with goods and services being sourced from more than 2,000 suppliers and vendors in 2019/20. This volume, alongside the number of homes we own and manage, inevitably increases the likelihood of us coming into contact with people who might be vulnerable to modern slavery and human trafficking.

Policies in relation to slavery and human trafficking

On 28 May 2019, Notting Hill Genesis became a signatory to the 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. Through our policies and approach, we seek to identify and mitigate human rights abuses relating to our employees, suppliers, and customers.

Our approach is underpinned by the United Nations guiding principles on business and human rights, the Universal Declaration of Human Rights, standards set out by the Living Wage Foundation, and the International Labour Organization's core conventions on freedom of association and collective bargaining, forced labour, child labour and discrimination at work.

Locally, we have several policies to support this approach, including:

- Safeguarding policy
- Procurement policy
- Recruitment policy
- Whistleblowing policy
- Anti-bribery, gifts, and hospitality policy
- Anti-money laundering policy

- Equality, diversity, and inclusion policy

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.

All policies are available to colleagues via our intranet. We additionally publish a set of [core policies on our website](#), and share others with external parties on request.

Our aim is to make modern slavery and safeguarding more widely everyone's business by:

- Empowering our workforce by delivering training and awareness programmes, and making resources available.
- Addressing business impact by recognising how our business could put individuals at risk of trafficking and slavery and addressing these issues.
- Proactively addressing the risk of trafficking and modern slavery by implementing policy and programmes to prevent it.
- Carrying out due diligence through consistent monitoring of prospects, customers, employees, cash flow, assets, insurance policies and third-party suppliers.
- Encouraging our people to look out for and report potential signs of slavery, human trafficking or other human rights abuses and support victims to access specialist services.

Due diligence processes

We have in place due diligence processes to inform a range of activities, including contract management, recruitment, and wage-setting. Periodic reviews of our housing stock along with other variables such as safeguarding referrals, construction, and safeguarding reports help us to develop recommendations on how to use the information to develop our safeguarding strategy and mitigate the risk of modern slavery.

To ensure best practice and continuous learning we have established a safeguarding committee. Chaired by our group director of housing, the committee includes representatives from across the business and meets quarterly to monitor, evaluate, and scrutinise our policies, procedures, and business practices in relation to safeguarding issues, including modern slavery. The committee additionally hears case reviews to learn from the practical experiences of our frontline colleagues and ensure that learning is shared with others and used to improve practices.

We have additionally established a network of safeguarding champions who meet monthly with our safeguarding lead to report on developments and share learning and best practice.

Risk assessment and management

Our risk-mapping process in conjunction with available literature on modern slavery has highlighted a higher level of risk within the construction sector in two key areas:

- The supply of a flexible labour force – the prevalence of outsourced workforces and the use of temporary migrant workers means that the lead contractors with whom we have relationships may have less control or transparency over the identity of their workforce or their working and living conditions.
- The supply of building materials – in construction, traceability can often be a problem because there are so many links in this fragmented chain. Whether it is bricks, timber, glass, granite, or a range of other products, it is often difficult to trace raw materials, and many are produced in countries where forced and child labour is rife.

Although we are taking ownership of these issues, their complexity means we cannot tackle them alone. To that end, we work in partnership with our contractors, joint ventures, subsidiaries, and supply chain to implement risk mitigation actions and address any concerns.

Our extensive supply chain also presents risks. To mitigate this, our procurement directorate conducts an annual audit of our top 100 suppliers with a turnover of more than £36 million, holding our suppliers and vendors accountable by ensuring they have a published modern slavery statement with actions.

Priorities and measures of effectiveness

Our aim	What this means	Examples of action
Increase our understanding of modern slavery	<p>Ensure organisation-wide understanding of modern slavery, our corporate and individual responsibilities, how it affects specific businesses.</p> <p>The organisation requires appropriate staff within the organisation to complete training on modern slavery.</p>	<p>Briefing pack for colleagues involved in the construction and IT sector.</p> <p>Use of modern slavery toolbox talk and displaying 'Are you alright?' posters on construction sites.</p> <p>Bespoke awareness training and support to construction and procurement teams.</p> <p>Modern slavery and trafficking embedded in our safeguarding training.</p> <p>Training available to employees through our learning and development programme.</p> <p>Publication of articles and information on modern slavery on our intranet to raise awareness, share our commitment and make it everyone's business.</p>
Contract monitoring and management	We have developed a system for supply chain verification whereby the organisation evaluates potential suppliers before they enter the supply chain	<p>Procurement framework to guide contract managers and monitor implementation of anti-slavery commitments.</p> <p>We review our existing supply chains to evaluate all existing suppliers and their commitment to anti-slavery and anti-trafficking practice.</p>
Suppliers and vendor management	We are committed to ensuring that our suppliers and vendors adhere to the highest standards of ethics and are compliant with the Modern Slavery Act 2015.	Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act

		<p>ethically and within the law in their use of labour.</p> <p>We work with suppliers to ensure that they meet the standards of the code and improve their workers' working conditions. Serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.</p>
Due diligence	We undertake due diligence when considering taking on new suppliers or vendors and regularly review our existing suppliers and vendors.	We evaluate the modern slavery and human trafficking risks of each new supplier and review our existing suppliers and vendors on a regular basis.
Recruitment and human resource	<p>We ensure we only engage with agencies who have robust policy and procedure in place and adhere to UK standards.</p> <p>We are committed to transparent recruitment processes.</p>	<p>We have engaged with reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from that agency.</p> <p>We have encouraged directors and leads to build a workplace culture that is protective and dutiful of workers' human rights.</p> <p>We have committed to ensuring the National Minimum Wage and Living Wage for all our employees.</p> <p>We have embedded "The Working Time (Amendment) Regulations 2003" in our current practices.</p>
Finance	Our financial regulations specify the steps that must be taken when entering contracts with suppliers.	<p>We ensure our commitment to transparency by conducting an annual audit and publishing an annual financial report.</p> <p>We have embedded formal tender processes for works contracts above £50,000 and up to and including Public Contracts Regulations (PCR) thresholds .</p> <p>Mandatory compliance with PCR for works , goods and services above PCR thresholds.</p>

<p>Victim support</p>	<p>We are committed to ensuring a clear referral pathway and anti-slavery resources are available for all staff.</p>	<p>Developed and publicised modern slavery resources on our intranet accessible to all staff.</p> <p>Updated links to specialist anti-slavery organisations supporting victims on intranet.</p> <p>Briefed staff across our departments, including development, housing and the wide reaching safeguarding committee on how to spot potential victims of modern slavery and what action to take.</p>
<p>Whistleblowing policy</p>	<p>We encourage all staff, customers, and other business partners to report any concerns related to our direct activities or supply chains. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.</p>	<p>Our whistleblowing procedure is designed to make it easy for staff to make disclosures, without fear of retaliation.</p>

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 Approved By: NHG Executive Board