



Modern Slavery Statement 2022

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 2020/2021.

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.

Impact of COVID-19

During the reporting period covered by this statement, COVID-19 persisted. For several months, the UK was placed in special measures to stem the spread of the virus. This created several challenges for us, but a substantial proportion of our employees continued to work during the pandemic with some exceptions where colleagues were placed on furlough. Throughout, we made sure employees continued to have access to relevant policies and procedures so that they could raise any concerns they may have had. Our response was managed through our crisis response group, who monitored the impact and agreed actions to mitigate risks both for colleagues and residents.

Additionally, in line with emergency legislation passed by the Government, employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking. During this time, our modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

Organisation structure and supply chains

Notting Hill Genesis 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 the surrounding area. 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 more than 1,200 new homes in 2021/22

Our product supply chains, vendors and customers are extensive, with goods and services being sourced from more than 1,500 suppliers and vendors in 2021/22. 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 Adults policy
- Safeguarding Children and Young Persons policy
- Young Person at work 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 a safeguarding committee. Chaired by our group director of commercial services, 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.

In addition, we have 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 conducted 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.

Highlights of our achievements in 2021/22:

As an organisation we continue to learn, develop, and embed good practice and in the last year we have achieved following outcomes.

- Established an anti-slavery working group which meets every quarter to review actions and progress
- Reviewed and updated our safeguarding adult, safeguarding children and young people policy to incorporate modern slavery and trafficking
- Raised awareness of modern slavery through internal platforms and made it accessible to all
- Circulated our modern slavery statement and our staff toolbox
- Promoted Anti-Slavery Day and events internally
- Sought to make our corporate modern slavery training mandatory for all colleagues in our development directorate
- Included modern slavery as scoring criteria as part of our of new development contractor and consultant procurement framework
- Made e-learning available to all staff and informed them of the appropriate action to take if they suspect a case of slavery or human trafficking
- Engaged with sector partners and attended external forums events to keep ourselves abreast of all emerging trends
- Reviewed our procurement strategies, guidance, processes, contract terms and conditions in line with the Modern Slavery Act and included references to modern slavery and human trafficking

Our commitment for 2022/23 to drive continued improvement

We remain committed to tackling the root causes of modern slavery by empowering workers, protecting vulnerable groups, and addressing business impact. After assessing our overall risk, our priorities for the year ahead are:

- To continue to raise awareness of modern slavery and human trafficking across our organisation and with partners
- To promote any updates of training resources across our teams



- To continue to map our supply chain and assess the risk of modern slavery and human trafficking within our operations
- To continue to monitor and assess top suppliers in high-risk areas, ensuring they move beyond compliance and are embedding more sustainable and ethical sourcing practices
- To identify risks regarding recruitment practices in our operations and ensure we and our recruitment partners are compliant with ensuring safe working environment, employee health, safety, and fair working conditions.
- To collaborate with our partners, industry peers, non-governmental organisations and others to collectively address and understand the systemic issues of labour abuses which drive instances of modern slavery
- To reflect on the impact of COVID-19 on our operations and the risk of slavery and trafficking during this time
- To learn from our experiences during the pandemic and apply that learning in developing future strategies for similar crisis situations

Approval

This statement under Section 54 of the UK Modern Slavery Act 2015 has been approved by the executive board for Notting Hill Genesis for the fiscal year ended 31 March 2022.

Date Approved: 3 May 2022

Approved By: Executive Board