



Anti-Slavery and Anti-Trafficking Statement 2023/24

This statement is made in accordance with the Modern Slavery Act 2015 on behalf of Notting Hill Genesis and all legal entities that are part of our larger group. Please see our annual report and financial statements for 2022/2023 for a complete list of all our subsidiary organisations.

Modern slavery is defined as the recruitment, movement (trafficking), harbouring, or receiving of children, women, or men for the purpose of exploitation through the use of force, coercion, abuse, deception, or other means. It is a crime under the Modern Slavery Act of 2015 to keep someone in a position of slavery, servitude, forced or compulsory labour, or to facilitate their travel with the intent of exploiting them soon after.

Our organisation 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 revenue exceeds £36 million.

We are one of the largest housing associations in London and the surrounding area, having been formed in 2018 by the merger of two well-established housing associations. We own and manage slightly more than 67,000 homes and employ about 1,700 people. We offer a variety of tenures and are committed to continuing to provide housing that is affordable to all. In addition, we have a significant development programme, with a total pipeline of around 12,000 new homes.

In 2022/23, our product supply chains, vendors, and customers are extensive, with goods and services sourced from more than 1,500 suppliers and vendors. This volume, combined with the number of homes we own, manage, and develop, increases the likelihood that we will come into contact with people who are 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, individual within the supply chain, 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 Organisation's core conventions on freedom of association and collective bargaining, forced labour, child labour and discrimination at work.

We have several policies in place to support this approach on a local level, including:



- Safeguarding adults' policy
- Safeguarding children and young person's 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 procedures ensure that all of our employees have the legal right to work and are employed in accordance with local labour laws. All policies are accessible to colleagues through our intranet. We also publish a set of core policies on our website and share others with third parties on request.

Our objective is to make modern slavery and safeguarding more widely accepted by:

- Empowering our workforce through training and awareness programmes and the availability of resources
- Addressing business impact by recognising and addressing how our business may put individuals at risk of human trafficking and slavery
- Addressing the risk of human trafficking and modern slavery in a proactive manner by implementing prevention policies and programmes
- Conducting due diligence by monitoring prospects, customers, employees, cash flow, assets, insurance policies, and third-party suppliers on a regular basis
- Encouraging our people to spot and report potential signs of slavery, human trafficking, or other human rights violations, and assisting victims in obtaining specialist services

Due diligence processes

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

We have a safeguarding committee to ensure best practices and continuous learning. The committee, which includes representatives from across the organisation, meets quarterly to monitor, evaluate, and scrutinise our policies, procedures, and business practices related to safeguarding issues, such as modern slavery and trafficking. The committee also hears case reviews in order to learn from the practical experiences of our customer-facing colleagues and to ensure that knowledge is shared.



Furthermore, we have a network of safeguarding champions who meet with our safeguarding lead on a quarterly basis 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 and trafficking has highlighted a higher level of risk within the construction sector in two key areas:

- The primary contractors we have relationships with may have less control or transparency over the identification of their workforce or their working and living conditions due to the availability of a flexible labour force, the popularity of outsourced workforces, and the use of temporary migrant workers
- The supply of building materials – because this chain is so disjointed and has so many links, traceability can frequently be an issue in the construction industry. Whether for bricks, wood, glass, granite, or a variety of other products, it can be challenging to track down the raw materials, and many are made in nations where child labour and forced labour are widespread

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 anti-slavery and anti-trafficking charities, 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.

Highlights of our achievements in 2022/23:

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

- Anti-slavery working group meets every quarter to review actions and progress and makes recommendations
- Facilitated a learning session in partnership with Gangmasters Labour Abuse Authority (GLA) and Wates (contractors) to raise awareness
- Raised awareness of modern slavery through internal platforms and made information accessible to all
- Circulated our modern slavery statement and our staff toolbox
- Promoted Anti-Slavery Day and events internally
- Included modern slavery as scoring criteria within our 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

Our commitment for 2023/24 to drive continued improvement

We remain committed to tackling the root causes of modern slavery and trafficking 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 safeguard victims of modern slavery and trafficking and link them with protective statutory agencies.

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 2023.

Date Approved: 18 April 2023

Approved By: Executive Board