

#### Introduction

St George Housing is dedicated to upholding ethical practices and policies to combat modern slavery and human trafficking (Modern Slavery). Our commitment includes preventing the involvement or exploitation of our personnel and assets for the benefit of those engaged in such activities. Additionally, we are committed to providing a comprehensive statement as mandated by the transparency provisions of the Modern Slavery Act 2015.

The Modern Slavery Act obliges organisations to take measures addressing modern slavery and human trafficking in their operations and supply chains. Although, SGH does not have a turnover that exceeds £36 million, as a responsible housing provider, we are releasing this statement outlining our efforts to identify and prevent potential instances of modern slavery.

### **Organizational Structure**

SGH is a charitable housing association registered under the Co-operative and Community Benefit Societies Act 2014: No: 9036. SGH intends to become regulated by the Regulator of Social Housing (RSH) and currently adheres to regulatory standards, including the National Housing Federation's Excellence in Governance Code.

#### **Mission and Values**

SGH's mission is to deliver safe, high quality, affordable housing, tenancy related services and build better communities.

#### **Policies Concerning Slavery and Modern Trafficking**

All SGH policies, subject to review by senior managers on behalf of the Senior Leadership Team, address modern slavery concerns. Our response to the Modern Slavery Act is incorporated into our Safeguarding policy and procedure, recognizing modern slavery as a form of abuse. Additional information on the Modern Slavery Act is disseminated to staff using online resources.

#### **Identifying Vulnerable Groups**

We acknowledge the vulnerability of groups such as migrant workers, illegal migrants, asylum seekers, homeless individuals, and those with learning difficulties. SGH is actively working to identify how modern slavery and human trafficking may impact our residents, customers, business, and supply chains. This involves educating staff and our partners on potential risks and incorporating best practices into policies and procedures.

### **Procurement**

Our procurement processes prioritise legal, ethical, and inclusive practices, emphasizing social and environmental benefits. In 2023, wed enhanced our procurement processes by ensuring suppliers and contractors confirm compliance with the Modern Slavery Act 2015.

# **Supply Chain Risk Assessment**

SGH conducts rigorous risk assessments for new supply contracts overseen by our Senior Leadership Team. Our Board reviews all risks, controls, and assurances. We include provisions in agreements with contractors requiring compliance with the Modern Slavery Act 2015.

# Safeguarding

Our Safeguarding policy mandates mandatory training for all staff and Board members, covering aspects such as modern slavery and human trafficking. Information leaflets on safeguarding, including modern slavery, are communicated to all customers and staff.

# **Code of Conduct and Whistleblowing**

SGH policies emphasize dignity at work and fair treatment. Our whistleblowing policy and procedure and Code of Conduct comply with the Modern Slavery Act 2015.

#### Recruitment

We only partner with organisations who adopt a recruitment and selection policy that is compliant with eligibility requirements to work in the UK, including necessary checks such as DBS. Our partner organisations are committed to paying their employees National Living Wage rates as a minimum.

# **Investigations/Due Diligence**

Our Senior Leadership Team, are responsible for investigating suspected instances of modern slavery. This aligns with our standardised response to safeguarding reports.

# **Training**

All staff and Board members complete an e-learning module on modern slavery and human trafficking as part of the Safeguarding module. Training materials are available on the SGH Staff Hub on our website covering background information and advice on raising concerns.

# **Supply Chains**

SGH's supply chains, primarily from the property maintenance and services sector are assessed for risks. While no high-risk operations are identified within our organization, medium-risk activities relate to property maintenance and services. Low-risk activities involve the provision of managing agents that deliver services for our general needs accommodation.

#### **Effectiveness**

To date, the Board and Senior Leadership Team are unaware of any modern slavery issues within our business or supply chains. Key Performance Indicators are currently being developed to measure effectiveness, and will be regular reported to the Board. SGH remains committed to continuous training to ensure staff understand the potential risks of modern slavery.

This statement, made under section 54(1) of the Modern Slavery Act 2015, serves as SGH's slavery and human trafficking statement for the financial year ending 31st March 2022.

Alice Agyepong

Chief Executive Officer