
MODERN SLAVERY COMPLIANCE STATEMENT 2024

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2024. Modern slavery is a crime and a violation of human rights. It takes various forms, including slavery, servitude, compulsory labour and human trafficking for exploitation and can have a significant adverse impact on individuals, families, and communities across the world.

Organisation structure

Longhurst Group undertakes a range of community and social activities, including housing, regeneration, community development and Specialised Housing services. We operate in 48 local authority areas across the Midlands and East of England, we own and manage over 25,000 homes. We are a charitable Housing Association registered as a community benefit society and registered with the Regulator of Social Housing and Care Quality Commission. We employ circa 886 colleagues across our areas of operation and have over 89 care and support locations. Our annual turnover is £170m.

Supply chain

The Group recognises that our greatest risk of modern slavery lies within our supply chain, namely where we rely on services provided to deliver our day-to-day business operations, such as:

- Care and support
- Construction Maintenance
- IT
- Temporary agency staff

Compliance

The Group has a zero-tolerance approach to modern slavery. Our Modern Slavery Policy is communicated to all colleagues, volunteers, apprentices as well as Board and Committee Members. The Group Board and Executive Leadership Team have overall responsibility for ensuring the Group complies with its legal and ethical obligations and that its policy is implemented effectively. At an operational level, line managers are responsible for engaging with their teams to implement and maintain the processes in place, ensuring all colleagues are informed and appropriately trained. Clear processes are in place for anyone who has any concerns about modern slavery and where to raise those concerns.

As a supplier of services to individuals and communities, we recognise slavery and human trafficking as a potential risk to the Group. In addition to our Modern Slavery Policy, we also seek to address this risk through the Group's other policies including:

- Whistleblowing Policy (part of the wider Speaking Out culture)
- Grievance Policy
- Disciplinary Policy
- Recruitment Policy
- Procurement Policy
- Safeguarding Adults Policy
- Safeguarding Children Policy
- Code of Conduct
- Domestic Abuse Policy
- Learning and Development Policy
- Equality, Diversity and Inclusion Policy

How we manage the risks

Longhurst Group is aware that its financial viability, reputation and Environmental, Social, and Governance (ESG) goals are intrinsically linked to how we manage our procurement and supply chain. We understand that strong procurement and supplier relationship management processes may improve our business performance; this is by acquiring the best value goods and services. Our procurement framework therefore, is an important part of how the Group prevents modern slavery within its services. The Group already looks to mitigate its exposure to modern slavery through its standard supplier terms and conditions, which include obligations on suppliers to comply with the Modern Slavery Act.

Our Procurement Team's process includes an invitation for suppliers, contractors and business partners to sign up to the voluntary Supplier Code of Conduct. The Group's Procurement Policy promotes an awareness of modern-day slavery to all colleagues. The Procurement Team has also bolstered its approach to preventing modern day slavery in our supply chains through reviewing our procurement approach in the following priority areas:

- Prioritising those suppliers with a high percentage of lower paid, unskilled, temporary migrant or agency labour.
- Identifying suppliers where the supply chain extends beyond the UK.
- Auditing and mapping supply chains for a sample of high-risk strategic suppliers and partners.
- Due diligence checks being a standard part of the procurement process.

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- Where unethical practice becomes known, colleagues are aware to take the appropriate action to report and remedy this in a timely manner.

Longhurst Group has developed a supplier due diligence checklist. This information is used to evaluate each supplier and their associated risks. This search is not limited to information provided solely by the supplier.

Colleagues

Colleagues are required to avoid any activity that might lead to, or suggest, a breach of this statement. Colleagues are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our organisation or supply chains at the earliest possible stage.

Disclosure can be made to an appropriate person under the Whistleblowing Procedure or to the Group's Safeguarding Lead. Alternatively contact can be made with the Group's external financial auditors or Public Concern at Work. Where any potential victim is identified, the Group will make a referral using the National Referral Mechanism.

All Longhurst Group policies emphasise our commitment to dignity at work and the fair treatment of colleagues and all policies are available to everyone in the Group. To ensure the risks of modern slavery and human trafficking in our supply chains and our business are understood, all new staff undergo a training session on modern slavery as part of their induction. Our Modern Slavery Policy is available on our internal and external websites. The Group also provides a mandatory e-learning module to be completed triennially by

all colleagues, with additional training for those responsible for hiring and contracting through agencies.

Next steps

In the next 12 months we intend to take the following steps:

- Continue to work with the business where contracts are procured outside of the Procurement Process to ensure that appropriate checks have been made.
- Continue to invite prospective suppliers to sign up to the Supplier Code of Conduct.
- Continue to raise awareness through various means across the business.
- Continue providing mandatory training for our employees as well as maintaining high levels of compliance of this training.
- Continue to monitor our risk exposure, focussing on key areas of risk.

As an organisation we continue to work together to tackle the risk of modern slavery and increase our efforts to engage with suppliers, following robust processes to tackle the risk of modern slavery and human trafficking.



This statement has been approved by Longhurst Group Board on 15 May 2024.



Julie Doyle
Chief Executive
15 May 2024



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