

Statement on Modern Slavery



L&Q is one of the UK's leading housing associations and one of London's largest residential developers. We own or manage approximately 105,000 homes primarily across London and the South East.

We are an exempt charity committed to a wider social responsibility. This commitment has been integrated throughout the work of the organisation.

We are committed to ensuring that we comply with our legal and regulatory responsibilities, including the Modern Slavery Act 2015. We continue to take care to ensure that slavery and human trafficking does not exist in any part of L&Q's business or supply chain.

As a landlord we are alert to all forms of modern slavery, particularly those that may exist in our tenancies. We are working on strengthening our ability to identify and thereby act on this particular form of resident vulnerability, exploitation and fraud. We will come across a wide range of residents which reflect a diverse variety of backgrounds and needs. We recognise that isolated residents and people with learning difficulties may be particularly vulnerable or at risk.

Our safeguarding of adults at risk policy (Safeguarding) highlights modern slavery and all staff have completed baseline safeguarding training to build awareness and understanding of our vulnerable residents, how to identify potential risk factors and at risk groups, including signs of exploitation and respond to them. Trafford Housing Trust (THT) joined the L&Q Group in October 2019. As trailed in our statement last year, THT's Safeguarding Policy, is now aligned with L&Q's which, as noted above, addresses the risk of modern slavery. However, following an audit carried out in 2022, we have decided that further mandatory training specifically on modern day slavery will be rolled out across the Group in 2023.

The extent of safeguarding training received by staff varied depending on their role, but all customer facing staff attend a full day virtual or classroom training. In addition, all staff receive e-learning training and an annual refresher. This training is mandatory. We have a dedicated safeguarding team in place that is available to offer advice and guidance to members of staff across the Group and we hold quarterly cross departmental safeguarding committee meetings. All staff will be required to confirm that they have read and understood L&Q's statement on modern day slavery.

We continued, through our unauthorised subletting, tenancy fraud and tenancy management policies and procedures, to work to ensure that we understand who is living in the properties we manage.

As an employer we continue to pay the living wage rate as set out by the Living Wage Foundation as a minimum for all staff other than apprentices – who receive the National Living Wage as a minimum.

We manage projects and procurements where services and products are sourced from suppliers. Most of these products are not sourced by us directly but are sourced by our contracted suppliers of services, goods and works. As an organisation that does not wish to work knowingly with any business involved in slavery or human trafficking in any part of its operations, we have taken the following steps:

- We require new suppliers to declare that they are not involved in slavery or human trafficking and have not been subject to any investigation in connection with any offence involving slavery or human trafficking.
- Our template contract and sub-contract documentation include provisions requiring our suppliers to take appropriate steps to ensure that there is no slavery or human trafficking in their supply chains.
- Our tender documentation notifies potential suppliers that we will expect them to comply with the Modern Slavery Act.
- Our Supplier Code of Conduct is published on the L&Q website. This includes the requirement that all suppliers comply with the Modern Slavery Act.
- Our procurement team has raised awareness of the risk of modern slavery within our Supply Chain Management Panel, a pan L&Q group of senior managers charged with driving developments in L&Q's approach to Supply Chain Management. This has underlined the need to pay particular attention to those procured goods/services carrying the highest risk of modern slavery within the supply chain, namely Construction, Agriculture and Textiles. We work with colleagues to focus specific assurance activities in the spend areas of highest risk.
- We have a whistleblowing policy for all staff.

We will assess any evidence of non-compliance and will take appropriate remedial action. We will only trade with those who comply with this statement and the terms of our contracts or those who are taking verifiable steps towards compliance.

Future Plans

The Group Procurement team is progressively adopting a Category Management approach to developing procurement strategies and managing L&Q's supply chain. This will provide greater visibility and assurance of labour practices including identification of activity that could constitute modern slavery in tiers 2 and 3 of our supply chain (the raw material suppliers and sub-contractors to our contractors) where the risk of modern slavery could be greatest.

There will be continued review of opportunities to align the overall THT's overall approach to modern slavery and human trafficking with L&Q's activities.

This statement is made under section 54(1) of the Modern Slavery Act 2015. It constitutes our Group's slavery and human trafficking statement for the financial year ending 31st March 2022. The turnover of the L&Q Group exceeds £36 million for that period.

This statement will be reviewed and updated on an annual basis and is approved by L&Q's Group Board. It applies to all companies and organisations within the Group with the exception of:

- The L&Q Estates portfolio, the L&Q Group's strategic land business, which has a separate statement that reflects the distinct nature of its activities, but is consistent with the Group policy; and
- THT, which has a separate statement.

Fiona Fletcher Smith
Group Chief Executive

