# THE BARNET GROUP

Modern Slavery Act Transparency Statement

This statement has been published in accordance with the Modern Slavery Act 2015. It is a single statement that sets out the steps taken by The Barnet Group Ltd, which includes Barnet Homes Ltd, during the financial year ending 31 March 2023 to reduce the risk of modern slavery in its business and supply chains.

## INTRODUCTION

This is The Barnet Group's eighth annual Modern Slavery Act Transparency Statement. We are committed to acting ethnically and with integrity in all our business relationships, to preventing opportunities for modern slavery from occurring within our supply chain or in any part of our business, and to playing our part to help safeguard any customers who may be at risk. In the past year we have continued our work to address the risk of modern slavery, ensuring that we have in place effective responses to that risk. We submitted our Modern Slavery Act Transparency Statement for 2021/22 to the government's Modern Slavery Statement Registry, and will do the same with this Statement.

We consider modern slavery to be a growing issue both within the UK and globally. According to the Global Slavery Index, modern slavery is the second largest criminal industry in the world, affecting an estimated 50 million people globally on any given day in 2021, an increase of 10 million people since 2016. Of those living in modern slavery, one in four were reported to be children, 54% were reported to be women and girls. Forced labour was the most prevalent form of modern slavery, affecting 27.6 million people, followed by 22 million people in forced marriage. Within the UK, it was estimated that 1.8 people per 1,000 of the population were living in modern slavery with an estimated 122,000 people affected; this had decreased from 2.1 per 1,000 in 2016. Within the Europe and Central Asia region, the UK ranked 38 of 47 countries for the highest prevalence of modern slavery. Globally, the UK ranked 145 of 160 countries.

In 2022, the Home Office's National Referral Mechanism received 16,938 referrals of potential victims of modern slavery; an increase of 33% compared to the preceding year, and the highest number of annual referrals since the NRM began in 2009. Of the UK referrals, 78% were male and 21% were female, with adult potential victims most commonly referred for labour exploitation and child potential victims most commonly referred for criminal exploitation. County lines referrals remained high, accounting for 13% of all referrals with the majority for male children.

As a provider of public services, we play a key role in tackling modern slavery through:

- identifying and referring victims;
- supporting victims through our safeguarding activities and housing and homelessness services;
- supporting and delivering community services and activities in partnership; and
- ensuring that our business and supply chains are free from modern slavery.

Our employees may come across modern slavery in different ways while going about their everyday duties, including:

- delivering housing and homelessness services;
- supporting community activities that may intersect with organised crime, gangs, drug-selling, and other crimes such as cannabis cultivation;
- resettling refugees or asylum seekers;
- general contact with customers and members of the public; and
- engagement with MPs and councillors and concerns they may raise regarding our residents and the properties we own or manage;
- safeguarding activities, including supporting victims who may be adults with care and support needs, or children.

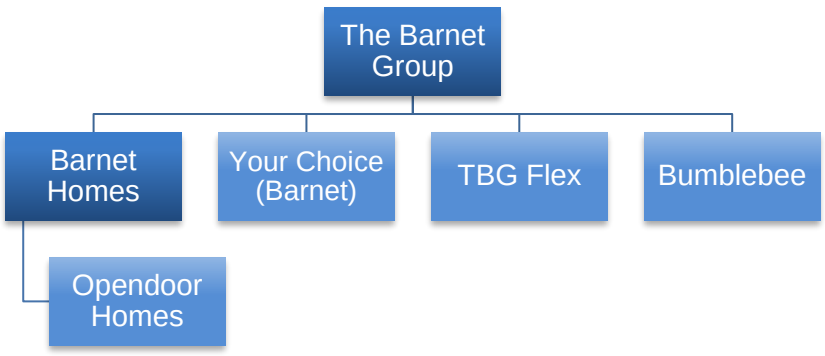
**Key areas of focus in 2022/23:**

- taking further steps to strengthen our monitoring of supplier compliance with the Modern Slavery Act 2015, including reporting on checks undertaken;
- reviewing our purchasing practices and how they could potentially put pressure on suppliers;
- taking further steps to increase the awareness of our employees, including through mandatory training and specialist training including fraud awareness and counter-terrorism awareness;
- working with our partners to start exploring ways to increase the visibility of our ICT goods and services supply chains.

## OUR BUSINESS

The Barnet Group is a not-for-profit Local Authority Trading Company that delivers services on behalf of the London Borough of Barnet ("the council"). It includes Barnet Homes, which was established as an Arms-Length Management Organisation (ALMO) in 2004, as a wholly owned subsidiary of the council, to manage its properties and from 2012 the council's homelessness service.

The Group also includes organisations that are not required to publish a Modern Slavery Act Compliance Statement: Your Choice (Barnet), a specialist provider of Adult Social Care services, TBG Flex, The Barnet Group's employment arm, TBG Open Door ("Opendoor Homes"), a subsidiary of Barnet Homes that is a registered society pursuant to section 115 of the Co-operative and Community Benefit Societies Act 2014 and is a private registered provider with the Regulator of Social Housing, and Bumblebee Lettings, an online private lettings service.






The principal activities of The Barnet Group include: the day-to-day management, maintenance, and improvement of the housing stock; management of the homelessness service; the development of new properties on behalf of the council; and the provision of specialist Adult Social Care services. As a group, we employ nearly 1,000 people, 100% of whom work in the UK, full- or part-time. Barnet Homes manages around 13,000 social housing homes on behalf of the council, mostly within the London Borough of Barnet, in addition to providing Adult Social Care and other services. Through our private registered provider Opendoor Homes we own and manage around 700 homes, and continue to develop and acquire more properties. Our main customers are tenants and leaseholders living in social housing and temporary accommodation, those at risk of homelessness, Adult Social Care clients and their families, and private tenants and landlords.

We are a group of organisations each with a strong social purpose that is driven by our values: show respect, find solutions, and make a difference. Much of our work is focused on supporting the wellbeing and welfare of our customers, and we work in partnership with other agencies and public bodies to identify and support vulnerable residents and service users. We also aim to be a great place to work for all our employees and to attract and retain the best talent.

Through our approach to being a responsible business, we aim to:

- responsibly manage our supply chain;
- treat customers and suppliers fairly and with respect; and
- align ethnical procurement with value for money.

Whilst there is no typical victim, statistics show that risk is higher amongst the most vulnerable, ethnic minorities, or socially excluded groups. These groups are highly-represented within social housing and Adult Social Care, and we are committed to taking action to reduce the risk of modern slavery across all parts of our business.

We recognise modern slavery is so pervasive that it may exist in the supply chains of the goods and services we purchase, including the technology we buy and our construction projects. We have a responsibility to ensure public money does not inadvertently fund criminal activity, and to protect vulnerable workers in our supply chains from exploitation.

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## RISK AND OUR SUPPLY CHAINS

The Barnet Group operates entirely in the UK, and largely in highly regulated sectors. The Barnet Group is subject to the Public Contract Regulations 2015, and its goods and services are almost exclusively provided by UK-based suppliers. In our 2021/22 statement we committed to reviewing our purchasing practices to understand any risk they could potentially put pressure on suppliers, leading to modern slavery through poor recruitment practices, worker conditions, and low pay for workers; we are renewing this commitment for 2023/24.

In 2021/22 we reviewed our suppliers that contribute to 80% of our spend across The Barnet Group, and as a result of this we consider that our largest area of risk is within construction. Generally, we consider our risk to be low, particularly within our operations, and risk is most likely to occur within our supply chains at tier 3 and below where products and services are provided to our organisation via our tier 2 suppliers. We regard the areas of potentially higher risk to be in the following areas:

- Procurement of services – there is a risk that modern slavery could occur in a supply chain through inadequate or inappropriate procurement practices, particularly in lower value contracts and 'one-off' purchases. Our supply chain consists mainly of services, with the highest risk areas being associated with our construction activities, but also with maintenance and cleaning activities. We have robust tendering and other processes for procurement in these areas, and have introduced additional controls over the past year.

- Procurement of goods – modern slavery is a risk in the ICT hardware and electronics that we purchase. Our procurement of ICT hardware is complex as it covers a large number of commodities that we may buy directly or indirectly, in bulk or in small quantities, and from a range of vendors depending on business needs. We also have limited visibility of our ICT supply chains. This is partly due to the multiple levels of sub-contracting for the raw material extraction, component manufacturing, assembly, and logistics. We will work with our partners the London Borough of Barnet and Capita to mitigate risks and develop sustainable solutions.

- Supporting vulnerable clients - we may also come across slavery and/or human trafficking in connection with the vulnerable people we support, in particular those from minority or socially excluded groups who may be subject to forced labour and/or domestic servitude, and potentially in connection with our workforce. The properties we own and/or manage could also be a potential venue for modern slavery.

We have put in place measures to mitigate the main risks arising from these areas, including:

- continuing to review our policy framework and implementing amendments to support compliance;
- mandating modern slavery awareness training for every employee, which explains the implications of the Modern Slavery Act and how they should recognise and report potential incidences;
- screening our procurement documentation to ensure that adequate safeguards are in place at each step in the process;
- providing suppliers and prospective suppliers with information about modern slavery, including our Modern Slavery Act Compliance Policy;

- reviewing low value tenders for potential issues, and rejecting any that do not meet our requirements including potential suppliers that do not pay the London Living Wage or tender prices for goods that we consider to be too low;
- ensuring The Barnet Group and any preferred supplier employment agencies we use have the correct checks within recruitment systems, such as eligibility to work in the UK, and Disclosure and Barring Service (DBS) checks;
- implementing robust tenancy management processes; and
- developing strong close working with other agencies to tackle issues and concerns related to modern slavery within the communities we support.

In 2021/22, The Barnet Group spent approximately £205 million on external goods, services, and works varying from construction of new buildings, property maintenance, cleaning, and other support, professional, and people-based services; of this, approximately £164 million was spent by Barnet Homes. These goods, services, and works are procured from a wide variety of local and national organisations, businesses, and voluntary sector organisations.

Our business model involves a number of supply chains across our business; primarily to help build, manage, and maintain our homes, and provide Adult Social Care services. The Barnet Group works with approximately 1,174 vendors, of which Barnet Homes works with approximately 725. Occasionally, our contractors may employ sub-contractors to delivery specialist services. This complexity within our supply chain increases the risk of involvement in modern slavery; however, we require our suppliers and contractors to comply with the Modern Slavery Act 2015 to work with us and we have processes in place to ensure we work with reputable companies. Our procurement procedures ensure adequate procurement pricing, prompt payment, and good planning, and wherever possible we aim to have long-term relationships with our suppliers.

Although risks associated with modern slavery are often heightened within the care sector due to the employment of agency workers, outsourcing, or sub-contracting, The Barnet Group does not outsource or sub-contract its care services, and employs over 90% of its employees directly. We do not recruit on seasonal contracts, and we aim to minimise the number of temporary and agency workers across the business. Where we do recruit temporary workers, our aim is to work with reputable agencies to meet the needs of the area of work, with preferred agencies appointed where appropriate. We have a strong relationship with recognised trade unions, and our employees have access to representation and to join an independent trade union.

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## OUR POLICIES AND PROCEDURES

Our policies, procedures, and contractual requirements set out the framework in which we operate to ensure that the risk of modern slavery within our business and our supply chain is reduced. They specify expectations of our employees, suppliers, business partners, and others who are directly linked to our business operations and services. Our policies are endorsed and approved by senior management, and are shared widely with our employees. Our current approach includes:

### Modern Slavery

Our Modern Slavery Act Compliance Policy sets out our commitment to tackling the risk of modern slavery within our business and our supply chain and to safeguarding the wellbeing of our customers and employees, and includes how we will deal with any related concerns. It refers to the national referral mechanism used to identify and refer potential victims of modern slavery to make sure they receive appropriate support.

### Recruitment

We treat all our employees fairly and equally. We comply with current employment legislation and recruit all staff according to best practice. We work to the highest professional standards and comply with all laws, regulations, and rules relevant to our business. We expect the same high standards from those companies with which we work.

Our Recruitment and Selection Policy and processes include verifying each employee's identity and their right to work in the United Kingdom before they start work with us, to safeguard against human-trafficking or individuals being forced to work against their will, and against abuse or coercion once in our employment. Our offer of employment for directly employed permanent and temporary employees includes:

- acceptance of terms and conditions within the contract of employment;
- receipt of satisfactory references;
- evidence of any required professional qualifications and essential requirements, such as clean driving licence;
- any necessary Disclosure and Barring Service checks, where applicable; and
- receipt of eligibility to work in the UK.

We monitor hours worked, rates of pay, and the calculation of legal deductions, and all new employees recruited through TBG Flex are provided with the same organisational benefits. We make salary payments directly to employees and do not delay, defer, or withhold payments unless there is prior arrangement or notification.

We have a free, comprehensive employee assistance service that offers guidance and counselling related to both the work activities and personal lives of our employees. This independent service also allows employees to raise any concerns in a confidential manner.

## Employee Code of Conduct

The Barnet Group expects the highest standards of conduct from its employees. The Code of Conduct is built around the recognition that everything we do in connection with our work should be measured against the highest possible standards of ethical business conduct and probity. It sets out employees' responsibility to serve our customers and the community in a way that is accountable and does not damage public confidence in the honesty and integrity of the Group, and to report without fear of recrimination any breaches of procedure or any impropriety.

## Whistleblowing

Our Whistleblowing Policy sets out our commitment to managing the organisation in the best way possible, and is in place to reassure our employees that it is safe and acceptable to speak up and raise concerns about actual or suspected criminal offences, including modern slavery, at an early stage. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith that their suspicion that modern slavery of any form is or may be taking place in any part of our own business or in our supply chain. Any incidents of whistleblowing are reported to and monitored by the Audit and Risk Committee.

## Procurement

The Barnet Group provides a range of public and private services, and is governed by legislation including the Public Contract Regulations 2015. Our Financial Regulations, Procurement Policy, and Procurement Procedure and Contract Procedure Rules set out the way in which we operate in a financially responsible manner and how we procure and manage contracts with suppliers.

## Safeguarding

Following the introduction of the Care Act 2014 and the Modern Slavery Act 2015, modern slavery, human-trafficking, sexual exploitation, and forced marriage are categories within London's multi-agency Safeguarding policies and training courses to which we subscribe, and are reflected in our own Safeguarding Policy and Procedure. Our Safeguarding Policy and Procedure provide measures to identify abuse or neglect, including modern slavery. They set out how our employees should report incidents and how to refer cases to the appropriate authorities where required.

## SUPPLIER DUE DILIGENCE

The Barnet Group, as a provider of public services, must follow the Public Contract Regulations 2015. We carry out due diligence checks prior to the award of and during contracts, as per the Regulations through which mandatory exclusion rules apply. All procurement is subject to selection and award criteria which reflect our organisational ethos.

The Barnet Group's tendering process is completed electronically through a portal for contracts above £25,000, and uses the standard Selection Questionnaire which includes questions related to the Modern Slavery Act 2015. We have reviewed our procurement processes to ensure we have a robust approach to eliminating the risk of modern slavery within our supply chains, and will continue to make improvements.

In 2017, we made changes to our documents including the form of tender, contract particulars, and contracts, to make specific requirements related to Modern Slavery. The Selection Questionnaire includes a failure implication should a potential supplier fail to comply with the Modern Slavery Act 2015's requirement to publish a Modern Slavery Act Transparency Statement, where required, or should a bidder have a conviction for an offence under Sections 1, 2, or 4 of the Act. Potential suppliers are required to upload their Transparency Statement, where applicable, to the procurement portal.

We complete a Most Economically Advantageous Tender (MEAT) check on low tenders to ensure that we take account of criteria that reflect qualitative, technical, and sustainable aspects of tenders in addition to price, and compare with others; for example, through Constructionline and the Contractors Health and Safety Assessment Scheme (CHAS).

We use recognised public sector contracts. Our standard agreement or contract includes termination clauses should a supplier be in breach of our requirements, including compliance with all local and national laws and regulations such as the Modern Slavery Act 2015. Our suppliers are also required to confirm that they provide safe working conditions for their employees.

Whilst we have historically required our contract managers to liaise with suppliers on an annual basis to ensure they are aware of our approach and to check they are compliant with the requirements of the Modern Slavery Act 2015, we recognise that our approach has been inconsistent in practice and have committed to adjusting our approach in future to ensure this is done more consistently. Our standard contracts also include a right to request documents or access to information that we consider necessary to conduct any audit investigation. Our Procurement team maintains a procurement schedule that lists all of our contracts, and approves all new suppliers to the business, ensuring that they meet our eligibility criteria including compliance with the Modern Slavery Act 2015.

Should suppliers fail to comply with the Modern Slavery Act 2015, we may cease to trade with them. Should it be discovered that a supplier has involvement in modern slavery, The Barnet Group will involve the necessary authorities so that appropriate action can be taken.

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## ACTION TAKEN TO ADDRESS MODERN SLAVERY

We recognise that as a provider of social housing in London, modern slavery could impact upon The Barnet Group through our supply chain or concern could be noted when attending a resident's property. We are committed to acting ethically and with integrity and transparency, and we expect our supply chain, contractors, employees, and all other business partners to commit to the same. This includes implementing and enforcing effective systems and controls to prevent and deter modern slavery.

### Safeguarding

Our Safeguarding Lead works closely with the council and community groups on safeguarding matters, including attending the Safeguarding Adults Board. We also have an internal Safeguarding Group that can be convened to discuss safeguarding issues, concerns, and good practice. Our Safeguarding Policy and Procedure were reviewed and updated in 2021/22, and incorporate modern slavery as a potential safeguarding issue. We operate within the safeguarding framework set by the London Multi-Agency

Safeguarding Policy, which includes modern slavery as a type or indicator of abuse and neglect, in line with the Care Act 2014's statutory guidance.

During 2022/23 no safeguarding concerns were raised in relation to modern slavery. All our new starters were required to complete safeguarding training, which includes awareness of modern slavery, and we require staff to complete refresher training at least every two years.

## Procurement

In 2021/22 we reviewed and updated our Procurement Policy and Procurement Procedure and Contract Procedure Rules, ensuring that these reflect our requirements regarding modern slavery, and made our procuring staff aware of the revised policy in line with the commitment we made in our 2020/21 statement. Our approach includes a Modern Slavery Act Supply Chain Compliance check to be completed regularly during the life of the contract.

Previously we committed to reviewing the option of completing a mapping exercise of our tier one suppliers to better identify and understand the areas of high risk, to working with our highest risk suppliers to raise awareness of our modern slavery policies, and to making our policy available to our suppliers. In 2021/22 we reviewed the suppliers in the top 80% of our overall spend across The Barnet Group, and we made suppliers aware of our modern slavery commitments and requirements through our tender documents.

## Recruitment and employment

We have robust policies and processes to ensure workers in our operations can raise concerns and make complaints, including through our Whistleblowing Policy, Grievance Policy, and Trade Union representation.

Our Recruitment and Selection Policy and Procedure include controls to safeguard against the risk of modern slavery or human trafficking, and against abuse of coercion once in employment. Our approach to employment prohibits any threat of violence, harassment, and intimidation of workers, prohibits discrimination, and prohibits child labour. The rights of workers are protected, including ensuring that workers' original identification documents are not confiscated, overtime is not compulsory, and workers have freedom to terminate their employment. We do not require workers to pay recruitment fees, and do not work with agencies that do so.

## Tenancy Management

Many of our employees come into regular contact with members of the public, including our residents and service users, and frequently visit the properties and neighbourhoods managed by The Barnet Group. The Barnet Group also holds regular in-person housing surgeries where residents can drop-in to meet with staff. Through these day-to-day and scheduled activities there is a possibility that employees could encounter somebody believed to be at risk of modern slavery.

We have robust processes in place to ensure that tenants are who they say they are when signing up to a new tenancy. Our housing management and caretaking staff and our repairs contractors monitor any external issues or changes with our properties or residents. We will always investigate any allegations from residents or the wider community regarding potential tenancy fraud. Our Housing Officers each have a target of 20 tenancy audits to complete each year, where our checks include for the signs of modern slavery as well as other welfare concerns that the tenants or members of their households may have.

Should we have concerns, we use the information gained through the tenancy audit in line with our wider safeguarding approach, which may include conducting another visit without notice, legal action, and/or referral to appropriate authorities, including safeguarding referrals. No concerns regarding modern slavery were raised through these audits in 2022/23.

We also monitor unusual activities, such as requests for a high number of keys for a property, reports of large numbers of people visiting a property, and any instances of locks being found on internal doors that are not bathrooms.

### Supporting communities

We are involved in several multi-agency groups with a range of partners including the council, the police, GPs, and other organisations. These groups tackle issues and concerns including those potentially related to modern slavery, and work in partnership on preventative activities as and when required, including MACE (Multi-Agency Child Exploitation), VARP (Vulnerable Adults Risk Panel), Serious Incident Review Meetings (SIRM), Community Safety MARAC (Multi-Agency Risk Assessment Conference), Strategic Reducing Offending Board, Youth Offending Team Management Board, and the Youth Justice Matters Board. We also work in partnership with the National Crime Agency as needed regarding accommodation. In the past we have worked with the community group Art Against Knives to address gangs and serious youth violence on one of our estates; this work also included addressing child sexual exploitation (CSE).

We also work closely with Barnet Council's Corporate Anti-Fraud Team (CAFT) and meet monthly to review cases. We work closely with the police to support investigations into and share information regarding concerns of modern slavery, and have ad-hoc liaison meetings to discuss emerging matters and share information. This has also included joint-working with the Gangs Unit, supporting police efforts to address concerns of cannabis cultivation, and working closely in cases of "cuckooing" where vulnerable people are exploited in their own homes. In 2021, we worked with the police regarding two cases of cuckooing on our estates, however these were not classed as modern day slavery or county lines cases.

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## TRAINING

Since 2017, we have provided regular briefings for our employees on modern slavery and our approach to managing associated risks. Since 2020/21 we have provided a mandatory e-learning refresher course for all existing staff, to be completed every two years. The training ensures that our employees:

- understand what modern slavery is;
- recognise the signs of modern slavery;
- understand their own responsibilities and the mechanisms in place within The Barnet Group to report any concerns around modern slavery; and
- have an overview of the wider support that is available to victims.

All new employees are required to complete modern slavery training and safeguarding training through our e-learning portal. More detailed safeguarding training is provided for Your Choice (Barnet) employees who work closely with adults who are more vulnerable or at risk. In 2017, our Safeguarding Lead received modern slavery awareness training as a member of the Barnet Safeguarding Adults Board (SAB), which included speakers from the Police and community support groups.

In our previous statement, we committed to rolling out fraud awareness training with more detailed training for employees working in Finance and HR, and to repeating counterterrorism awareness training for frontline staff. All staff were required to complete fraud prevention training from November 2021, and all new starters are now enrolled onto this course. We have renewed our commitment to more detailed, targeted fraud awareness training and counterterrorism training in 2023/24.

In our previous statements, we committed to providing specialist training on modern slavery to our Human Resources team, and we plan to deliver this in 2023/24.

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## MONITORING EFFECTIVENESS

We monitor on a quarterly basis a suite of compliance performance measures including new starter completion of the mandatory modern slavery and safeguarding training courses and existing staff completion of the biennial refresher training. In 2022/23 we did not meet our targets for new starters to complete their training within one month of joining the organisation, however refresher training is due for the majority of our longstanding employees in 2023/24, and we will continue to work to ensure all staff and new starters complete this mandatory training.

In 2020/21 we also committed to implementing biennial checks of the suppliers that comprise 80% of the overall spend across all companies within The Barnet Group, to reporting on the proportion of suppliers that

respond about the Modern Slavery compliance policy, and to undertaking a desktop review of 20% of any suppliers that do not respond. In our review in 2021/22, 92% of suppliers (60 of 65) within this group had not published a Modern Slavery Compliance statement on their website. We committed to undertaking further checks on the 5 exceptions by November 2022.

During 2022/23 we have received no whistleblowing reports related to modern slavery, and no concerns have been raised regarding our supply chain.

The main method of monitoring effectiveness within our supply chain is the selection criteria for suppliers, which include a requirement to have measures in place to minimise the possibility of modern slavery in their business and supply chain. We also use Constructiononline, whose gold membership includes legislation checks such as modern slavery. We use Equifax reports and alerts to monitor the business status of our suppliers, along with checks of information held on the Companies House website.

We recognise that performance indicators are important in driving the performance of a business and shaping the way it operates, and that they can also affect how exposed the business is to the risk of modern slavery. We take this into consideration when setting performance indicators for our suppliers, and work closely with them to mitigate the risk that creating environments in which modern slavery, particularly in the shape of bonded labour, may become a way a supplier tries to deal with unrealistic short time pressures and related expectations (including late or extended payments, unfair penalties, and accuracy of technical specifications) on their operations or supplying partnership.

In 2020/21 we amended the terms of reference for our internal audits of procurement and compliance to ensure our approach is compliant with the Modern Slavery Act 2015. In an internal audit of Procurement in September 2021, The Barnet Group's appointed auditors reviewed a sample of contracts and found that the due diligence checks required under our policies, including supplier compliance with the Modern Slavery Act 2015, were undertaken, ad in September 2022 modern slavery was referenced in the Operational Fraud Risk Management audit. A Key Control Health Check audit in February 2023 returned an assessment of "control effective" regarding the publication of the Modern Slavery Act Transparency Statement.

## FURTHER STEPS

Whilst we have delivered some of the further steps we committed to in previous years, we will continue to work on some of these activities in 2023/24.

We will review how we can strengthen our monitoring of supplier compliance with the Modern Slavery Act through our contract managers' annual checks, so that we can report on the proportion of suppliers that respond about their policy on modern slavery and compliance with the Act.

We will review our purchasing practices and how they could potentially put pressure on suppliers, leading to modern slavery through poor recruitment practices, worker conditions, and low pay for workers. This may include, for example:

- aggressive pricing that does not consider sustainable production costs
- short lead times
- late high-volume orders
- inaccurate forecasting
- withdrawing from contracts last-minute
- unfair penalties for not meeting orders despite last minute changes
- accuracy of technical specifications

We will take further steps to increase the awareness of our employees, including:

- ensuring 100% completion of mandatory modern slavery training, both for new starters and as refreshers for existing employees;
- working with the council to roll out more detailed fraud awareness training for employees working in Finance and HR and managing contracts, and counter-terrorism awareness for frontline staff in 2022/23.

We will provide specialist training on modern slavery to our Human Resources team.

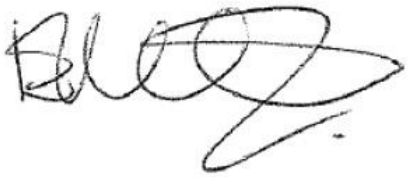
We will work with our partners the London Borough of Barnet to start exploring ways to increase the visibility of our ICT goods and services supply chains and ensure the sustainability of our procurement practices.

All employees will be made aware of our Modern Slavery Act Transparency Statement through our internal communications.

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## DECLARATION

This statement was approved by The Barnet Group's Board of Directors on 21 September 2023, and is made pursuant to section 54 of the Modern Slavery Act 2015.



Eamon McGoldrick
Chair of the Board
for and on behalf of The Barnet Group, including Barnet Homes