

Slavery and Human Trafficking Statement 2023/2024

Purpose and scope of this Statement

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (“the Act”) and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2024. In this Statement slavery and human trafficking is referred to as modern slavery. This Statement applies to all legal entities that form part of The Guinness Partnership Group, except for Shepherds Bush Housing Association Ltd which joined the Group as a subsidiary in December 2023, where a separate Statement applies. The Guinness Partnership’s subsidiaries are listed at the end of this Statement.

About The Guinness Partnership

We are one of the oldest and largest providers of affordable housing and care in England. We own and manage 68,000 homes and provide services to over 160,000 residents across the country. Guinness Property, our in-house maintenance service, delivers repairs to 54,000 of our homes and our care and support service delivers over 7,000 hours of care each week. Our purpose is to improve people’s lives and create opportunities for them.

Our core activities are delivered by 2,500 staff. They comprise developing and managing homes for social and affordable rent, affordable home ownership; delivering housing and care services for older people; and providing support for residents who might need extra help with issues like managing their money or getting into work. Our social purpose means that any surplus we make is re-invested in new and existing homes and improving our services for the benefit of our residents and their communities.

Our activities are regulated by the Regulator of Social Housing and the Care Quality Commission.

We have assessed the overall risk of modern slavery within our own business and supply chains to be low given the approach we take to risk management and the controls and assurance frameworks we have in place.

The risk may be higher in relation to our homes as they may be used to facilitate modern slavery given the potential vulnerability of some of our residents. We have measures in place to prevent, detect, investigate and take appropriate action to deal with incidents.

Our commitment

We are strongly opposed to modern slavery. We will do what we can to prevent and combat such abuses in our business, in our supply chains and in connection with the residents we support.

We act ethically and with the highest standards of integrity, quality, probity, openness and accountability in all our business operations and relationships. We are committed to being open and transparent in how we conduct our business and interact with residents and other stakeholders, and we publish a range of information relating to our approach to transparency and sharing information.

We will not knowingly deal with any business involved in modern slavery. If any is found in a supplier we are working with, we will act collaboratively with them to resolve and prevent further occurrences. Our relationship with our supplier may be terminated if a serious breach occurs, or if sufficient improvement is not made.

In our own business

We will continue to be vigilant and where a compliance breach is identified, we will act promptly, involve the appropriate agencies and feedback lessons learnt in order to minimise the risk of an incident occurring again. We have a modern slavery reporting system so that concerns about staff, suppliers, and our residents may be recorded as they occur.

We have a Staff Whistleblowing policy which enables all employees or others with serious concerns over any aspect of our work to come forward and express those concerns. If there is a case to answer, the person

concerned would be reported to the relevant authorities and the matter will be dealt with under our Capability, Discipline and Grievance Policy.

All employees of The Guinness Partnership Limited and its subsidiaries are paid the Real Living Wage or above.

Employees who are victims of modern slavery may contact an Employee Assistance Programme provided by an independent health & well-being provider. This provides employees with 24 hours/365 days access to a confidential advice line. They also provide counselling services and legal and financial advice. Guinness would be responsive and supportive to any employee affected by modern slavery.

Our policies, training, internal controls, and regular reporting provide visibility and assurance that risks are minimised. We are not aware of any incidents during the year. However, we will continue to be vigilant and where a compliance breach is identified, we will act promptly, involve the appropriate lead agencies and feedback lessons learnt to minimise the risk of an incident occurring again.

Our supply chain

We engage with a wide variety of organisations for a broad range of goods and services which are primarily corporate, construction and property maintenance-related, but also to meet some more specialist requirements. Our procurement activities take place in England and our contractors and suppliers are predominantly UK based, though their materials suppliers and workforces are often not.

Our residents

We have a role to play to keep our residents, and the people who live with them safe, so they may live free from abuse and neglect. We operate on the basis that safeguarding is everyone's responsibility and have robust procedures in place so that appropriate action is taken when concerns are raised. Safeguarding training is mandatory for all resident facing staff, as they are more likely to witness or receive safeguarding concerns.

Some of the people we house are vulnerable to modern slavery, particularly those that are lonely or isolated or those with a substance use addiction. The form the modern slavery may take includes financial control & abuse, cuckooing and forced criminality.

Our policy framework

Our policies are reviewed at least every three years and are supported by training and effective communication.

Among the policies that are relevant to slavery and human trafficking are:

- Allocations
- Anti-bribery & anti-corruption
- Anti-fraud
- Anti-money laundering
- Anti-social behaviour, hate crime and hate incidents
- Capability, discipline and grievance
- Conflicts of interest
- Diversity and inclusion
- Domestic abuse (colleagues)
- Health and safety
- Private use of contractors, suppliers and consultants
- Recruitment & selection
- Resident domestic abuse
- Customer safeguarding
- Staff payments and benefits
- Staff whistleblowing
- Tenancy fraud.

Among the codes of conduct that are relevant to slavery and human trafficking are:

- Code of conduct for staff
- Code of conduct for board members

- Code of conduct of suppliers and contractors
- Code of governance.

In 2023/24, the following policies were updated: Anti-bribery & Anti-Corruption, Anti- Fraud, Anti-Money Laundering, Customer Safeguarding, Private Use of Contractors, Suppliers and Consultants and Staff Whistleblowing.

We developed a Domestic Abuse Policy for colleagues to support those who are experienced or have experienced domestic abuse during their employment.

We will continue to review and update relevant policies and procedures as necessary, so that we take effective and proportionate steps to ensure there is no modern slavery in our business or our supply chains.

Risk management, due diligence and monitoring effectiveness

We take a group-wide approach to risk management through our Corporate Risk Plan and supporting Risk Management Strategy and Framework. Our approach enables us to consider the full spectrum of risk and manage the combined impact of those risks. Potential risks are mitigated by our policies and procedures, controls built into our business operations, internal audits and the knowledge, skills and behaviours of our staff. Examples of these controls include financial regulations, codes of conduct, staff training and performance monitoring. This provides assurance that the risks are minimised.

Our potential modern slavery risk areas are building construction works, repairs & maintenance works, in the sourcing of raw materials by our contractors, and contract staff. There is an additional risk that some of our residents may be vulnerable to modern slavery. Information about these risks is included below.

Building construction, repairs and maintenance works

Risk may arise with smaller contractors. We manage this, in particular where there are complex subcontractor arrangements. Assurance is provided as all Guinness's procurement activities are subject to the Public Contracts Regulations 2015 and compliance with the Modern Slavery Act is assessed as part of our selection criteria. This provides us with assurance that contractors more exposed to modern slavery risk are excluded from our operations.

The due diligence conducted on suppliers joining a framework agreement includes modern slavery compliance checks. The framework suppliers are monitored annually for statutory obligation compliance. Breach of contract will result in removal from the framework.

Our framework agreements for procuring employers' agents, cost consultants, architects and consultants also include mitigations against the risk of modern slavery.

Additional protection is afforded by our Employers' Requirements and schedule of services and appointment documents for consultants.

The sourcing of raw materials

The risk in suppliers sourcing raw materials arises as materials may be from countries where slavery is more prevalent. To mitigate these risks, we include modern slavery clauses in contracts. We conduct supplier on-boarding checks, request method statements to understand whether the delivery model raises any modern slavery concerns, and we question bidders further when unexpectedly low costs are submitted. Our suppliers are managed by designated contract managers and regular contract management meetings are held.

Our robust tendering process and due diligence ensures we engage with reputable contractors and suppliers who adhere to all appropriate legislation, regulation and practices. Our contract management arrangements help us ensure contractors maintain the standards required, including the prevention of modern slavery. Our exposure to building construction, repairs & maintenance and supply of raw materials risks has remained the same during the year.

Contract staff

There is a risk associated with having a large number of contractors and agencies to supply staff for service contracts as the potential for risk may increase with the number of contractors involved. We control this by using reputable, well-known contractors and agencies with whom we have enjoyed a strong relationship. Self-certification processes are used to check legal compliance, and evidence is required to corroborate that specific vetting checks have taken place in respect of the staff. Guinness only uses agencies sourced from

our approved list. Most of our supported housing agency staff are supplied by large registered providers taken from local authority approved lists and are required to produce a modern slavery statement in their own right. Our exposure to agency staffing risks has remained the same during the year. The level of risk in our office service contract is low as we work with a single national contractor and have robust contract management arrangements in place.

Residents

During the year, we became aware of some residents being exploited. Most of the cases relate to cuckooing whereby offenders take over a person's home and use the property to facilitate exploitation. Where we became aware, if requested to do so, we helped the police to gather intelligence so that enforcement action may be taken against the criminals. We additionally supported the police and multi- agency partnerships to assist the victim, by enabling or providing rehousing, or where it was appropriate to do so, by improving the security of the property.

Recorded instances of modern slavery affecting our residents increased slightly due to improved reporting capabilities, but remained small, during 2023/24.

Training and awareness

We continued to raise staff awareness and we provided modern slavery information to our suppliers and contractors, where appropriate.

We deliver safeguarding training which is mandatory for all resident facing staff and domestic abuse training for relevant resident facing staff. Additionally, we have an eLearning course on Modern Slavery and Human Trafficking which is available to all staff.

During 2023/24 we:

- Developed a new contract management framework which sets out our standards and requirements
- Ensured all colleagues who manage contracts complete contract management learning
- Retendered for agency staff suppliers requiring those suppliers to do additional checks on the people they employ
- Ensured all residents in our regulated care service receive a review of their care plan which included identifying the risk of exploitation
- Expanded usage of our CRM system to enable enhanced reporting of cases of modern slavery concerns affecting our residents
- Became the first housing association in the country to achieve Enhanced Accreditation status following a successful re-accreditation by DAHA (Domestic Abuse Housing Alliance).

In 2024/25, we will continue to develop, implement and enforce processes and controls that seek to ensure modern slavery is not taking place within our business, our supply chains, or in connection with the residents we support.

Compliance

We have not identified any breaches of the Act in our business or our supply chains during 2023/24.

This Statement was approved by the Board. It will be reviewed on an annual basis.

Date of approval: 24 July 2024

Signed 
Chris Wilson (Chair)

Date: 24 July 2024

This Statement applies to The Guinness Partnership Limited (Charitable Community Benefit Society 31693R, Registered Provider of Social Housing 4729) and its subsidiaries as follows:

- Guinness Housing Association Limited - Non-Charitable Community Benefit Society 17017R. Registered Provider of Social Housing L2441.
- Guinness Developments Limited - Private Limited Company, 04175094
- Guinness Homes Limited - Private Limited Company, 05710006
- Halco 1397 Limited - Private Limited Company, 05998281
- City Response Limited (trading as Guinness Property) - Private Limited Company, 4471280
- Guinness Platform Limited - Private Limited Company, 06411652.

SBHA (Charitable Community Benefit Society No 16442R, Registered Provider of Social Housing No. LH0050), a subsidiary of The Guinness Partnership Limited, has a separate Modern Slavery Statement.