



Modern Slavery and Human Trafficking Statement 2025/2026

Purpose of Statement

This statement is made in accordance with the Modern Slavery Act 2015 on behalf of Notting Hill Genesis and all legal entities that are part of our group. Please see our [website](#) for a complete list of all our subsidiary organisations.

Organisation

We are one of the largest housing associations in London and the surrounding areas and are committed to doing all we can to prevent slavery and human trafficking in our organisation and supply chain.

Policies

We have a zero tolerance for slavery, child labour and human trafficking. We are committed to working ethically and with integrity in all our business dealings and with employees, residents and all stakeholders. This commitment is supported by a robust framework of policies to support detection and prevention and training for employees. These policies include:

- Allocations and lettings
- Anti-bribery
- Anti-fraud
- Anti-money laundering
- Code of conduct for employees
- Code of conduct for contractors
- Equality, diversity, and inclusion
- Procurement
- Recruitment
- Safeguarding adults
- Safeguarding children and young persons
- Tenancy fraud and unauthorised occupants
- Whistleblowing
- Young people at work

Our People

Our people play a vital role in preventing modern slavery and upholding ethical standards across our organisation. We employ over 1,800 colleagues and ensure all employees have the legal right to work and are employed in line with relevant labour laws.

During the year, we launched a new set of organisational values, shaped by extensive engagement with colleagues and residents. These values — we succeed together, we keep our word, and we do better every day — set clear expectations for how we work, support one another, and act with integrity. We will continue to embed these values across the organisation to guide behaviours and decision-making at all levels.

All colleagues receive appropriate training to ensure they are aware of the risks of modern slavery and understand their responsibilities in identifying and responding to potential concerns. We are committed to maintaining a culture where colleagues feel confident to speak up, and where concerns are taken seriously and addressed appropriately.

If an employee were to become a victim of slavery or human trafficking, they would be able to access support through our independent and confidential employee assistance programme.

We consider the overall risk of slavery and human trafficking in our operations to be minimal. However, we are committed to staying alert and taking immediate action in the event of any compliance breach, including involving the appropriate authorities and applying lessons learned to prevent future incidents.

Residents

We want our residents to feel safe in their homes and local communities, and to be protected from harm and abuse including modern slavery and human trafficking.

We're committed to doing what we can to safeguard the well-being of residents who work with our staff, benefit from our services and receive care from us.

We recognise that some of our residents may be vulnerable to slavery and human trafficking and we have extensive internal policies and procedures in place to respond to and mitigate this risk and provide channels for the reporting of concerns. All our resident-facing staff receive safeguarding and modern slavery training on how to identify abuse and to take the appropriate action.

Supply Chain

Our supply chain is extensive with goods and services sourced directly, and indirectly from more than 1,400 suppliers; the vast majority of which are based in the UK. The volume of suppliers, focus on the construction sector, and high-level of indirect spend, are our key supply chain risk factors for slavery and human trafficking.

In line with Government guidance on the pre-qualification of suppliers in a tender process, our tender questionnaires are based on the periodically updated *Procurement Specific Questionnaire (PSQ)*, aligned with the *Procurement Act 2023 (PA23)* which includes the review of the centrally published debarment list:-

The PSQ provides confirmation of core supplier information via the Central Digital Platform (CDP). This captures labour market, slavery and human trafficking offences, and provides for mandatory and discretionary exclusion grounds of a supplier or connected person, depending on the severity of the offence. The PSQ

requires suppliers to submit their own (and their connected persons) exclusions information via the CDP. This may include whether any of the exclusion grounds apply, details of the incidents, and whether any mitigating actions have been taken.

The PSQ allows us to set specific conditions which a supplier must satisfy to be awarded a public contract including a section on “Tackling Modern Slavery in Supply Chains”. This provides for an evaluation of suppliers modern slavery statements (or other relevant or similar documents if not subject to the Modern Slavery Act 2015) to ensure that they have policies and due diligence processes in relation to slavery and human trafficking in its business and supply chains including the steps to assess and manage this risk.

To enable standardisation of supplier due diligence checks, we have adopted the PSQ structure as a starting point to develop proportionate questions in the tender documents for lower value procurements.

Where appropriate, the Common Assessment Standard (CAS) is used as an alternative selection questionnaire for public works contracts, above the relevant regulatory thresholds, which includes the same mandatory and discretionary grounds for exclusion the PSQ. Declarations are mirrored in our on-boarding process for new suppliers, to review compliance with the annual reporting requirements contained within Section 54 of the Modern Slavery Act 2015. This also addresses checks on low value suppliers that have been appointed in line with financial regulations.

Otherwise, our standard contract terms include conditions in respect of compliance with anti-slavery and human trafficking laws and policies as well as declarations that they will not engage in any activity, practice or conduct that would constitute an offence under the Modern Slavery Act 2015. This extends to suppliers' subcontractors and its supply chain to ensure compliance with laws, statutes, regulations and codes from time to time in force including but not limited to the Modern Slavery Act 2015.

We work in partnership with our contractors, joint ventures, subsidiaries, and our suppliers during their contracting period with us to implement risk mitigation actions and address any concerns.

To mitigate the risk in our supply chain we conduct an annual audit of our top 100 suppliers with a turnover of more than £36 million which includes ensuring they have a published modern slavery statement. Our standard contracts include requirements for suppliers to reduce the risk of slavery and human trafficking in their businesses and supply chain during the life of their contract with us.

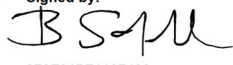
During this coming year we will be doing more to develop our supplier relationship management. We are developing our in-vendor life management procedures to support our identification and investigation activities.

Approval

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 on behalf of Notting Hill Genesis and all legal entities that are part of our larger group. Please see our annual report for a list of our subsidiary organisations.

Approved by the Board for Notting Hill Genesis for the fiscal year ended 31 March 2026.

Signed:

Signed by:

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Brendan Sarsfield, Chair