Modern Slavery and Human Trafficking Statement for 2024-25

This Statement sets out Origin's commitment to recognising and preventing slavery and human trafficking in all its business activities and within its supply chains.

Organisation Structure and Business

Origin is a housing association which owns and manages over 7,800 homes in London and Hertfordshire. We are an exempt charity committed to a wider social responsibility.
On 16 April 2024, we completed a merger to become a subsidiary of Places for People.

Our core purpose remains the same as it did when we were established in 1924, which is to improve living conditions by providing safe, decent, affordable homes for those in need. To help subsidise the development of affordable homes we also build and develop open market housing and reinvest all profits to support our social purpose. This commitment has been integrated throughout the work of the organisation.

We recognise the detrimental effect modern slavery has on global society and we are committed to acting ethically and with integrity within our business and with others to combat this. We take all reasonable steps to ensure slavery and human trafficking is not taking place in our business or supply chains through implementing and enforcing effective systems and controls.

As a landlord we are alert to all forms of modern slavery, particularly those that may exist in our tenancies. Our approach to combatting modern slavery and human trafficking is in keeping with our social purpose, our desire to demonstrate ethical business practices that are aligned with our ethos, and to meet our legal and regulatory duties.

Our Policies

We have a robust framework of policies, procedures and contractual arrangements in place which contributes towards the prevention of slavery or human trafficking within our organisation and our supply chains.

These include, but are not limited to, areas such as housing management, risk management, safeguarding, health and safety, recruitment, whistleblowing, procurement, terms and conditions of employment, and codes of conduct for staff, suppliers and contractors, as well as due diligence and checks when recruiting staff or engaging suppliers or contractors.

They are reviewed to a formal timetable to ensure that they reflect best practice and to mitigate against risks.

Our People

We are committed to paying the London Living Wage to all our directly employed staff in London and the Living Wage to those staff outside of London. We regularly review our terms of employment to ensure that they comply with all relevant legislation.

We have well-embedded processes for checking eligibility to work and maintain robust records.

We only use specified, reputable employment agencies to source labour and always verify the practices of any new agency we use before accepting workers from that agency. This is reflected in our Recruitment & Selection Policy.

We expect all employees to adhere to the Group's Staff Code of Conduct. We ensure that we have systems in place with an overarching policy statement as well as a whistleblowing policy to encourage the reporting of concerns and the protection of whistle blowers.

Our Residents

A small number of our residents receive a care and support service directly from Origin in 145 homes specialising in people with learning disabilities and a young people's pathway service in Camden for young people coming through the care system and unaccompanied asylum seekers. Additionally, we house 136 residents who may be vulnerable or at risk and are provided with support services through third party suppliers who hold contracts with the relevant local authorities.

Additionally, we have a service in Enfield working with single homeless people, mostly with no other recourse to housing. Most of the properties are shared and many of the people we house are young adults. In total the service provides 342 homes.

Origin provides an intensive housing management service for these schemes through our specialist team in Care and Support. It is standard practice to take a multi-agency approach in these services working with both social care departments and a range of other professionals.

We carry out mandatory safeguarding training and work to our safeguarding policy and local authority safeguarding procedures to protect vulnerable residents.

Supply Chain & Procurement

Our supply chains include goods and services for the construction, repair and maintenance of residential homes.

We also purchase goods and services to facilitate the running of our business and our office premises. As we are based in and operate solely within the UK, we have identified that our overall exposure to the risk of slavery and human trafficking is low.

We already take action to ensure that we are compliant with employment law, and many of our contractors and suppliers are in the UK and are also required to follow UK employment law.

We are committed to ensuring that we are not complicit in modern slavery in our supply chains or in any part of our organisation and as part of our initiative to identify and mitigate risk during procurement, either from a framework, or by buying direct from the open market. Our systems and controls include:

- Requiring 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
- Provisions in our template contract documentation requiring our suppliers to take all reasonable steps to ensure that there is no slavery or human trafficking in their supply chains
- Our Code of Conduct for Partner Organisations which includes a section on modern slavery activities. By tendering, potential contractors and suppliers are agreeing to adhere to the Code
- Monitoring our supply chain using Credit Safe. This system allows us to check a supplier's financial viability, credit rating, risk of failure, company overview and names of directors.

We expect those in our supply chain and contractors to comply with our values and legislation. The executive team and senior management group are responsible for compliance in their respective departments and for their supplier relationships.

The Group's relationships are closest with tier one suppliers. However, risks of modern slavery are often further down a supply chain since there is less visibility over working practices. To effectively conduct due diligence and understand where modern slavery risks reside, we will aim to progressively improve its understanding and oversight of all tiers of their supply chains.

Performance - this year we have:

- Maintained clear risk management arrangements for the purposes of ensuring the effective identification, monitoring, and management of risk across the business including those associated with modern slavery and human trafficking. A risk and assurance framework is in place to capture and manage risks
- Regularly reviewed the organisation's policies and procedures which are designed to ensure we maintain our high standards of probity, accountability, and openness, preventing the risk of unknowingly harbouring illegal, unethical, or improper conduct and continued to ensure our safeguarding and domestic abuse policies, procedures, and training encompassed modern slavery
- Made relevant pre-employment checks such as 'right to work in the United Kingdom' checks and worked only with reputable agencies
- Paid all employees the London Living Wage rate as a minimum for their basic salary and made payments directly to colleagues
- Engaged with suppliers who complied with the Modern Slavery Act 2015 and conducted robust due diligence to assure ourselves via requirements to answer specific government recommended questions on modern slavery prior to contracts being agreed
- Published our annual modern slavery and human trafficking statement on our website
- Maintained our links with other housing associations to share information about best practices in tackling modern slavery
- Encouraged reporting of concerns related to our own activities or our supply chain through our whistleblowing policies.



Signed by Carol Carter in her capacity as Chief Executive Officer of Origin Housing Group Limited

Date: 21 May 2025