Paradigm Housing Group: Modern Slavery Statement

1. Introduction

This statement sets out Paradigm's commitment to act ethically and to comply with the principles of the Modern Slavery Act 2015 (MSA). As required by the MSA, this statement outlines the steps we have taken to recognise and prevent potential incidences of modern slavery and human trafficking in our business activities and within our supply chains.

The statement covers our current position on modern slavery and activities undertaken during the financial year 2021/2022. It will be renewed annually as required by the MSA.

2. Organisation structure, business and supply chains

Paradigm is a not for profit, registered provider of social housing, regulated by the Regulator of Social Housing (RSH). We manage over 16,000 properties across 30 different local authorities in South East England and have a large development portfolio of homes for both rent and sale.

Within the Paradigm Group, two organisations are registered providers of social housing – Paradigm Housing Group Limited (PHGL) and Paradigm Homes Charitable Housing Association Limited (PHCHA), a subsidiary of PHGL Paradigm Development Services Limited (PDSL) is a wholly owned subsidiary of PHGL, undertaking developments which are generally transferred to other group members on completion.

PHGL, PHCHA and PDSL, all have a turnover in excess of £36m, and therefore require formal coverage by this statement. However, our Modern Slavery Statement applies to the whole *active Paradigm group which during the financial year 2020/2021 also included Paradigm Commercial Limited (PCL) and Paradigm Maintenance Limited. All active parts of the Group are expected to minimise the risks of slavery and human trafficking in their business and supply chains.

Responsibility for compliance with the MSA rests at the highest level with our Amalgamated Board for PHGL, PHCHA and PCL, and responsibility for PDSL rests with the directors of that entity, the Chief Executive and Executive Director of Finance. Operational responsibility is delegated to the Executive Director of Finance (procurement and supply chain), the Executive Director, Strategy and Business Services (human resources) and the Executive Director - Customer (safeguarding and vulnerable customers).

Our supply chain consists of services and goods sourced and supplied from both the UK and abroad. We have an approved list of contractors and suppliers that we work with, and our purchase order payment system requires the use of pre-approved suppliers. We will not deal with or do business with any company that is knowingly involved in slavery or human trafficking in any part of its operations.

We will continue to review our procurement policies regarding tenders and contracts to ensure they reflect best practice, and which mitigate against the risk of modern slavery.

3. Policies and procedures

The risk of modern slavery and human trafficking within our organisation is avoided and mitigated by adherence to and regular review of our policies and procedures, and by ensuring staff are aware of potential risks.

Our policies and strategies that are relevant to modern slavery are:

- Fraud, Anti Bribery & Corruption policy
- Code of Conduct
- Code of Governance
- Procurement strategy
- Recruitment policy
- Safeguarding policy (including vulnerable persons)
- Whistleblowing policy

Our Modern Slavery Statement is required to be read by all staff and is available for staff to view on our Intranet along with other policies.

We also include adherence to Modern Slavery in our annual statement of internal controls which are approved by the Chair of the Board.

4. Procurement

We have not identified any breaches of the Act during 2021/2022. We will continue to be vigilant and where a breach is identified, we will act promptly, involve the relevant lead agencies such as the Police or National Crime Agency and carry out a review to identify where different or further measures are required in order to minimise the risk of an incident occurring again.

We are committed to ensuring that ethical trading and ethical labour policies and practices are incorporated in our procurement process and have taken the following steps:

- All potential suppliers must confirm they comply with all applicable legislation, including, but not limited to, slavery, forced labour, human trafficking, immigration, health and safety and the environment.

- Companies who are required (by virtue of their turnover) to produce a statement on modern slavery will be asked to confirm they have such a statement and provide a copy where necessary.

5. Lettings

At letting, where a proposed tenant has not been previously nominated by the local authority or where this cannot be established and in cases such as mutual exchange or nomination from a charity, we verify identity and residency status checks, including photo ID, immigration and age checks of those signing our tenancy agreements. If an applicant is nominated by the local authority, these checks are carried out by the local authority.

Our tenancy management policies and procedures assist us in understanding who is living in the properties that we own and manage.

6. Safeguarding

Our Safeguarding Policy covers vulnerable persons and applies to the protection of children, young people and adults at risk. All staff receive safeguarding training to recognise the signs of abuse, neglect and self-neglect including how to record and report it. Paradigm will raise awareness and develop a culture that does not tolerate abuse and encourages people to raise concerns.

7. Human Resources

We are committed to ensuring that our employees and workers are not subject to any form of servitude, forced, compulsory or bonded labour. We will have a duty of care towards our employees, and they will have the freedom to leave freely and without threat to themselves or their family. Our employees have access to a free, independent and confidential Employee Assistance Programme. This provides employees with 24 hours/365 days access to a telephone support line, as well as access to structured counselling as part of the service.

All our employees are treated fairly and equally and will be provided with clear and transparent information about rates of pay, hours worked and legal deductions.

Our Reporting Concerns at Work (whistleblowing) policy aims to encourage people to speak out and report concerns if they believe malpractice or wrongdoing is taking place. This includes actions by our suppliers and contractors. This policy is drawn to the attention of all new staff as part of the induction process.

The checks undertaken as part of our recruitment processes (such as eligibility to work in the UK and Disclosure and Barring Service (DBS) checks) also support our work in this area. As an employer, Paradigm pays the National Living Wage as a minimum.

8. Training

We use our learning and development programmes and our internal communications to ensure that we sustain staff awareness of the risks of modern slavery. We will continue to provide relevant information and training as part of this work.

All staff complete mandatory Modern Slavery training within their first month of employment with us, and every 2 years thereafter. Compliance is monitored by line managers and the Learning & Development team.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Paradigm's modern slavery and human trafficking statement for the financial year 2021/2022.

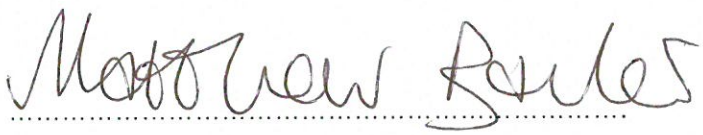
9. Recommendation for 2022/23

- Continue limiting risk - during the annual review of existing contracts, all suppliers must sign to confirm that they comply with the MSA and undertake their own due diligence on their supply chains to limit the risk of modern slavery taking place within those supply chains.

Approved by the Amalgamated Board and the Board of Paradigm Development Services Limited on 22 September 2022

Signed by:

Matthew Bailes



On behalf of the Amalgamated Board and Paradigm Development Services Limited

*[Footnote] Paradigm Maintenance Limited was an active part of the Paradigm Group until it ceased trading on 28 February 2022. Prior to that, it did not meet the statutory threshold for reporting under the MSA, but it has been included in this Statement as, whilst active, it was required to comply with the Group policies and procedures to minimise the risks of slavery and human trafficking in its business and supply chain.