

St Mungo's Community Housing Association

Modern Slavery Act 2015 Statement – 2021/22

Introduction

We are proud of the steps we take to tackle modern slavery and human trafficking, both in our supply chains and in the support we provide to people who have experienced or are at risk of homelessness. We are committed to reviewing and continually improving our practice in this area year on year.

St Mungo's structure

We are a housing association and charity providing homelessness and support services across the South of England. We are the parent company of St Mungo's Homes, Broadway Homelessness and Support, Street Impact London, Street Impact Brighton, and a shareholding partner in Social Impact Bristol. St Mungo's has approximately 1,600 staff and works with around 250 volunteers per year.

We run a wide range of services. These include outreach services to help people sleeping rough leave the streets, advice services to prevent homelessness, and health, wellbeing, learning and skills services that enable our clients to recover from homelessness and rebuild their lives. Some but not all of these support services are linked to residential projects such as our hostels and supported housing. Last year alone, we supported over 31,600 clients across over 200 services, with projects designed to support a wide range of needs: from those requiring intensive support to those just needing signposting; and from delivering preventive work to long term support.

St Mungo's owns, manages or leases 281 properties ranging from hostels to supported housing and care homes, in total amounting to over 3,640 bedspaces.

St Mungo's has a global annual turnover of £118m. We spend more than £48m on our third party supply chain.

Our supply chain

St Mungo's does not operate an extensive, worldwide supply chain. This means we are able to build close relationships with suppliers that enable us to promote our commitment to social impact and responsibility, living wage, sustainable procurement and supporting the local economy where possible. We work with our supply chain providers to eliminate modern slavery and human trafficking.

Our largest areas of spend are utilities, property repair and maintenance services, agency staff working in our housing support and care services, and IT services.

Our approach to preventing modern slavery and human trafficking

The Modern Slavery Act 2015 requires all public bodies and their partners to adopt policies and practices which proactively tackle modern slavery and human trafficking. St Mungo's is committed to ensure this is monitored throughout our organisation and the supply chain, expecting that all our supply chain providers and their subcontractors apply such practices. We expect all our staff to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure such practices are understood, reported and identified and tackled effectively. Our Procurement and Contracts Regulations, St Mungo's Procurement Strategy, the Ethical Procurement Policy and contract

management guidance and tools have been communicated to raise awareness and compliance across our managers, staff and the supply chain.

Communications

We share this statement with our staff, volunteers and clients and raise awareness of the Modern Slavery Act 2015 and what action to take if there are any concerns. This statement is placed prominently on our website www.mungos.org and is also made available for all stakeholders on the new Home Office public registry.

Our staff

We have clear recruitment procedures and processes including Right to Work checks for all permanent and interim staff. We pay at least the London Living Wage in all our London-based services. We pay at least the living wage in other regions we work in.

We ensure that any recruitment partners we use for temporary staff pay the London Living Wage in our London-based services. Our national and regional partners apply living wage standards. We also ensure that these partners apply good HR practices and processes including Right to Work checks. St Mungo's has access to these records and carries out regular checks to ensure they are up to date and accurate, and to confirm that our partners are held to the same high standards of compliance as we maintain.

Procurement

We have a clear procurement policy, with regularly reviewed procurement thresholds and procedures in place. We seek to apply fair, transparent and responsible procurement practices in each stage of procurement activity. All contractors are subject to robust internal checks and our main contractors also receive at least annual review meetings.

Our procurement leadership is trained in Protecting Human Rights in the Supply Chain and the procurement team complete an annual ethical test in line with the requirements of the best practices set by the government and the professional body, the Chartered Institute of Procurement and Supply.

Over 80% of our repairs and maintenance contractors are members of a professional trade body, either Contractors Health and Safety Assessment Scheme or Constructionline.

St Mungo's is a member of a number of procurement consortia, providing access to suppliers who have been checked for their compliance with ethical procurement standards. We are an affiliated member of *Electronic Watch*. This is an independent monitoring organisation which helps public sector buyers meet their responsibility to protect the labour rights of workers in global electronics supply chains.

Whistleblowing

St Mungo's has a Whistleblowing Policy through which staff can raise concerns in confidence with a nominated person at Director level. Serious concerns are investigated and a summary of any cases is reported quarterly to the organisation's Assurance and Risk Committee.

Code of Conduct

All St Mungo's managers and staff have to adhere to a Code of Conduct which clearly sets out expected standards of behaviour. The Code requires staff to act with honesty and

integrity, to report misconduct, and to take responsibility for safeguarding as appropriate for their role.

Safeguarding

As part of our work we identify and support people who have experienced modern slavery or human trafficking and put them in touch with specialist organisations who can provide further advice and support. All St Mungo's staff are required to complete mandatory safeguarding e-learning on an annual basis which includes content on modern slavery. In addition, client-facing staff have to attend a safeguarding webinar. We monitor training compliance rates via our 'Solid Foundations' compliance programme.

There is a dedicated email for staff to ask for advice about managing safeguarding matters which is managed by our Quality team. Staff can also take particularly complex cases to our monthly 'Safeguarding Surgery' for extra support from colleagues with expertise in key areas of safeguarding.

We have an annual Trustee Safeguarding Committee and our Clients Services Committee oversees safeguarding. The Chair of the Board receives a monthly safeguarding report from the Deputy Safeguarding Lead on any serious cases, and we also complete an annual review of all safeguarding cases to identify trends and learning. Our Safeguarding Policy is reviewed by our trustees annually.

Partnership working and learning from specialist agencies

We operate a matrix system across our client services structure and have a Modern Slavery matrix lead who is responsible for policy, best practice and supporting service development in this area. At a local level, our managers are involved in various initiatives to identify and take action to prevent modern slavery and human trafficking. For example, we are involved in Tri-Borough Outreach Anti-trafficking Protocol and Tri-Borough Modern Slavery operational meetings. We have also contributed anonymised client data to a shared research project on modern slavery and exploitation. We regularly share and promote good practice guidance from specialist agencies to improve staff expertise, raise awareness and skill up staff.

Tenancy and licence management

We have comprehensive referral processes into all our services, including checking proof of identity. We carry out regular checks on all clients living in our properties as part of the support we offer. This greatly minimises the risk of any of our clients living in our accommodation being subject to modern slavery or human trafficking.

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

Emma Haddad, Chief Executive
St Mungo's Community Housing Association
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