Curo Group (Albion) Limited Modern Slavery and Human Trafficking Statement 2023

Introduction

This statement sets out our commitment to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are fully committed to conducting our business with the utmost ethical and moral standards and have implemented effective systems and controls to prevent any instances of slavery or human trafficking in our supply chains. Our Modern Slavery and Human Trafficking Statement underscores this commitment, and we do not wish to engage with any business that is knowingly involved in slavery or human trafficking in any aspect of its operations. As an employer, we are dedicated to treating our employees fairly and ensuring that they are paid the Living Wage across England. We regularly review our terms of employment to ensure that they align with all relevant legislation.

Organisational structure, business and responsibilities

Curo is a housing association and housebuilder based in Bath, providing affordable homes and high-quality care and support services across the West of England. Our 650 colleagues provide services to more than 27,000 customers; we manage approx. 14,000 homes and are building hundreds of new homes every year.

Our modern slavery statement applies to Curo and its subsidiary companies as listed below:
Curo Places Limited
Curo Choice Limited
Curo Market Rented Services Limited
Mulberry Park Community Benefit Society
Curo Finance Limited

Curo Enterprise Limited will publish a separate Modern Slavery Statement because it has a turnover of more than £36million.

We are aware that we may also come across slavery and/or human trafficking in connection with the vulnerable people we support, especially those from minority or socially excluded groups who may be subject to forced labour and/or domestic servitude. Our homes could also be a potential base for modern slavery.

Procurement and Supply Chain

Our supply chain consists mainly of works contractors and service providers, with the highest risk areas in relation to modern slavery being associated with our building and maintenance activity and communal services. We have a minimal supply chain outside the United Kingdom.

The Procurement Team monitor relationships with contracted suppliers for Curo Group (excluding Curo Enterprise) and maintain a central Modern Slavery Register listing all Curo contracts and the obligations of each contracted supplier regarding Modern Slavery. Each supplier's Modern Slavery statements are saved on our contract management system, Intend.

All suppliers are asked to declare they are compliant with the MSA when they register on our supplier portal and again when they bid for any tender. Further detail is requested from suppliers in relation to supply chains (as relevant) at tender stage.

Our policies, procedures and due diligence
We are currently reviewing our Modern Slavery policy to ensure that it remains effective and compliant with relevant legislation.

The other key policies which support our Modern Slavery Policy include specific policies on Safeguarding, Procurement, Recruitment, Whistle Blowing and Reportable Events.

We have implemented a range of measures to ensure that our operations and supply chains are free from any form of exploitation or forced labour. We have established a dedicated working group to oversee our approach to modern slavery, which includes regular reviews of our policies and procedures to ensure they remain effective and compliant with relevant legislation.

Curo recognises the importance of identifying and assessing the risks of modern slavery within its operations and supply chains. Curo has implemented a robust risk assessment process that involves a comprehensive review of its policies, procedures, and contractual obligations. Our risk register identifies potential risks of modern slavery, which is periodically reviewed by the Board as part of our Assurance Report and updated.

Training and implementation
Our staff receive regular training on identifying and addressing instances of modern slavery, and we have established clear reporting channels to encourage the reporting of any concerns and suspicions.

Our induction programme includes a briefing about safeguarding, at which new colleagues are made aware of our policy and procedures. Safeguarding eLearning covers awareness of modern slavery and how to report suspected abuse. Colleagues must complete this training on an annual basis with 91% of colleagues having completed it.

Safeguarding is everyone's responsibility, which is why our Tenancy Compliance teams are partnering with the local council on their Community Safety and Safeguarding Partnership to protect children, adults, families and communities who most need our help.

We believe that our approach to addressing modern slavery is aligned with our values and our commitment to ethical and sustainable business practices. We are committed to continuously improving our performance in this area and to playing our part in the fight against modern slavery.

This statement is made under section 54(1) of the Modern Slavery Act 2015. It constitutes our Group's modern slavery and human trafficking statement for the financial year 1 April 2022 to 31 March 2023.

This statement was approved by the Combined Board for all Curo Group companies (excluding Curo Enterprise Limited) on 24 July 2023.



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Victor da Cunha
Chief Executive
24 July 2023