



Paradigm Housing Group: Modern Slavery Statement

1. Introduction

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 2024/25.

It sets out the steps we have taken during the 2024/25 financial year to ensure that slavery and human trafficking is not taking place in any of our supply chains, and in any part of our business. The statement will be reviewed annually.

2. Organisation structure

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 group (Paradigm), two organisations are registered as housing providers with the Regulator of Social Housing (RSH):

- Paradigm Housing Group Limited (PHG)
- Paradigm Homes Charitable Housing Association Limited (PHCHA), a subsidiary of PHG.

Paradigm Development Services Limited (PDSL) is a wholly owned subsidiary of PHG, undertaking developments which are usually transferred to Group members on completion. Paradigm Maintenance Limited (PML) is a wholly owned subsidiary of PHG and has been dormant since 1 April 2022.

PHCHA has one subsidiary: Paradigm Commercial Limited, (PCL) whose principal activity is to purchase vacant properties and/or land, to develop to provide properties for letting or for sale, and to manage properties for rent. PHCHA is also the sole trustee to Mary Bailey-Smith Almshouses, a small charity with three properties in management.

PHG, 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 2024/2025 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 PHG, PHCHA and PCL, and responsibility for PDSL rests with the directors of that entity, the Chief Executive, Chief Financial Officer and Executive Director of Development. Operational responsibility is delegated to the Executive Director, Strategy and Business Services (procurement, supply chain, human resources and training) and the Executive Director - Customer (Lettings, safeguarding and vulnerable customers).

3. Supply chain

We procure goods and services directly and through our contractual relationships and our partnerships with suppliers and other agencies. Our supply chain consists of services and goods sourced and supplied from both the UK, Europe and beyond. 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 or support 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.

4. Procurement

We are committed to ensuring that ethical trading and ethical labour policies and practices are incorporated in our procurement process.

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 provide us with a link to their policy. Where companies do not have a statement, they will be asked to use and adopt our Modern Slavery Statement.

Over the next year, we will be further strengthening our position with improved data collection and compliance checks with existing supplier contracts or frameworks. We will introduce a Modern Slavery audit questionnaire/scoring matrix at tender stage. Allowing for risks to be assessed and managed upon application and then ongoing through the life of the contract.

We will review any suppliers identified as High risk to ensure they are managing their supply chain effectively.

5. 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 are reviewed at least every three years and are supported by training, publication and effective communication.

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

- Fraud, Anti Bribery & Corruption Policy
- Code of Conduct
- Code of Governance
- Recruitment Policy
- Safeguarding Policy (including vulnerable persons)
- Whistleblowing Policy
- Domestic Abuse Policy
- Customer Support Policy
- Lettings 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 will continue to review and update relevant policies and procedures as necessary, so that we take effective and proportionate steps to ensure there is no modern slavery in our business or our supply chains.

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

6. Lettings

At letting, we verify identity and residency status of every member of the household. This includes photo ID, immigration and age status. If an applicant is nominated by the local authority, these checks are also 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.

7. Safeguarding

Our Safeguarding Policy covers vulnerable persons and applies to the protection of children, young people and adults who may be at risk. All staff receive mandatory safeguarding training to recognise the signs of abuse, neglect and self-neglect including how to record and report it. We also have a safeguarding Panel which oversees our policy and approach to safeguarding, ensuring we monitor cases, identify themes and effectiveness of training and awareness. Through this training, reporting systems, Panel and our partnership working, Paradigm will raise awareness and develop a culture that does not tolerate abuse, actively seeks to identify hidden cases of abuse and encourages people to raise concerns.

8. 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.

As an employer we are committed to paying the national living wage as a minimum and regularly review our terms of employment to ensure they comply with all relevant legislation. 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 where relevant, Disclosure and Barring Service (DBS) checks also support our work in this area.

9. 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.

10. Compliance

We have not identified any breaches of the Act during 2024/2025. In 2025/26, we will continue to develop, implement and enforce processes and controls that seek to ensure modern slavery is not taking place within our business, our supply chains, or in connection with the residents we support. 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.

Approved by the Amalgamated Board and the Board of Paradigm Development Services Limited on 25 September 2025

Signed by:

Matthew Bailes



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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.