Golden Lane Housing Limited

Modern Slavery Statement

Introduction

This Modern Slavery and Human Trafficking Statement is published in accordance with Section 54(1) of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 31st March 2025.

Golden Lane Housing Limited ("the Company", "we", "us" or "our") is committed to preventing slavery and human trafficking violations in our operations, our supply chain, and the provision of our services. We have a zero-tolerance towards slavery and require our supply chain to comply with our values.

Overall accountability for the Anti-Slavery and Human Trafficking Statement is held by the Executive Leadership team. The statement is ultimately approved by the Board.

Organisational Structure

Golden Lane Housing Limited is a charitable Community Benefit Society, registered with the Financial Conduct Authority under the Co-operative and Community Benefit Societies Act 2014, registered number 8734, and a Registered Provider of Social Housing registered number 4803.

We are a national specialist learning disability housing association, providing homes to over 3,000 people with a learning disability and autistic people across England, Wales and Northern Ireland.

Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chain we have adopted the following due diligence procedures:

- Supplier due diligence assessments
- Supplier modern slavery declarations of compliance
- Requiring compliance with the Modern Slavery Act in our Procurement Procedural Guidance
- Where available, we utilise sector frameworks which have robust processes for screening the suppliers whose services are available to us
- Appointing a specialist Procurement Manager to uphold best practices in purchasing and procurement
- Our Code of Conduct sets out expected behaviours and principles

- Our suite of policies (Whistleblowing, Procurement, Safeguarding, Recruitment etc) set out our expectations in respect of reporting serious concerns

We do not have any direct supply chain outside of the UK. We remain committed to enhancing our procurement practices concerning tenders and contracts to ensure they align with best practices, legislative requirements, and prioritising modern slavery considerations in all procurement activities.

Risk assessment and management

Golden Lane Housing assesses the potential risk of worker exploitation and modern slavery across the organisation through our risk assessment process which considers external, internal, and emerging risks and how these are mitigated.

We have several teams that conduct wellbeing and asset due diligence in homes by observing and checking the welfare of our customers which provide opportunities to proactively check for signs of slavery and exploitation. These teams include Housing Officer, assets and repairs, health and safety, and customers can report their own concerns to the Tenant Engagement Team. In addition, Golden Lane holds resident meetings (More Voices, More Choices and Board and Tenants Working Together) to hear directly from tenants.

Tenants

Some of our tenants are vulnerable to modern slavery and we have a part to play in keeping our tenants safe in their homes. We have appointed a Safeguarding Lead to ensure colleagues are comprehensively trained to identify and raise safeguarding concerns. It is everyone's responsibility to ensure concerns over modern slavery and safeguarding are reported and dealt with.

Employment Practices

We review our terms of employment regularly to ensure they comply with all relevant legislation. We feel there is a very low risk of slavery or human trafficking within our business. With agency staff, we use reputable suppliers and we have policies and procedures designed to mitigate any risks. We carry out 'the right to work in the UK' as required to minimise exploitation.

Relevant polices may include (but are not limited to);

- Anti-bribery and Anti-Fraud
- Safeguarding
- Recruitment
- Whistleblowing
- Equity, Diversity and inclusion
- Code of Conduct

All policies and procedures are available to all colleagues and some are published on our website. We will continue to review and update policies and procedures where necessary to ensure there is no slavery and human trafficking within our business.

Key Performance Indicators

As part of our anti-slavery action plan, in 2025/26 we are reviewing the development of behaviour-based KPIs (Key Performance Indicators) to enable efficient oversight and ensure that we take a targeted steps to address risks and issues. This will increase stakeholder confidence in our approach.

Training and awareness

We include safeguarding and anti-slavery training in our induction process to raise awareness among employees. Training is delivered in person and is supported by online video training which includes a course assessment to evidence understand and awareness.

Golden Lane Housing's executives recognise our responsibilities as a responsible landlord to take appropriate steps to identify and prevent slavery and human trafficking. In 2025/26, we will deliver briefing sessions to equip Executives and Board members with the contextual and practical knowledge to provide strong governance and aid decision-making, enabling our anti-slavery agenda to progress and be tailored to the business.

Next steps

Work is underway to strengthen our approach and we will report against these activities in our Statement next year.

Our ongoing commitments and activities planned for 2024/25

Organisational structure: to embed ownership, monitoring, reporting and governance of the anti-slavery and exploitation agenda into our governance structures, including oversight of anti-modern slavery activities by the Risk and Audit Committee,

Risk assessment and management: to create a risk assessment checklist for third party contractual relationships and conduct a high-level risk assessment of supplier categories and customer demographics to inform enhanced due diligence and develop a clear escalation process to manage and investigate exploitation concerns.

Training and Awareness: to embed an enhanced Modern Slavery Policy across the organisation with specialised training to colleagues involved in procurement, asset management, tenant involvement, housing and development activities; introduce a ''See it, Say it'' policy with clear reporting and escalation channels which ensure sensitive but thorough investigations are undertaken. This will ensure modern slavery and exploitation

cases are identified and supports monitoring of evolving trends so that we can adapt our risk management methods when necessary.

Key performance indicators: to review the development of behaviour-based KPIs to enable efficient oversight, ensuring we take targeted steps to address risks and issues.

Statement Approval

This statement has been approved by the Board of Golden Lane Housing Limited.

Signed: 

John Verge Chief Executive Officer

Date: *23rd September 2025*