MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

For the Financial Year ending 31 March 2024

Introduction

We recognise our responsibility to take a robust approach to combat slavery and human trafficking. We're committed to preventing slavery and human trafficking in our corporate activities and to ensure that our supply chains are free from slavery and human trafficking.

Outlined below are the steps we've taken to target Modern Slavery for the financial year ending 31 March 2024, which covers the period 01 April 2023 to 31 March 2024, along with details on the further actions we'll take in the new financial year. We'll continue to examine the effectiveness of our approach, to ensure continuous improvement.

This statement covers the whole of Golding Homes' group, but only Golding Homes as parent is required to produce the statement on behalf of the Group.

Golding Homes' organisational structure and supply chains

This statement covers the activities of Golding Homes and its subsidiary companies. All of our activity takes place within the Southeast of England. The principal activity of Golding Homes is the provision of homes for rent, shared ownership, development, and sales.

We deliver homes and services for over 20,000 people across Kent, and we recognise our social responsibility to invest in our communities and improve the life opportunities of our customers. Our team of nearly 300 colleagues, supported by our contractors and suppliers provide opportunity for affordable, independent, and secure living as well as creating opportunities for personal development.

Our supply chains include goods and services for the construction, repair and maintenance of residential homes. We also purchase goods and services to facilitate running our office premises and our delivery of services.

We're committed to compliance with all legal and regulatory requirements and in establishing and following best practice. We're committed to treating those who work with us fairly and equally.

Risk Assessment

We consider the position of our suppliers and seek assurances from suppliers on the actions they're taking to prevent slavery and human trafficking. Risk assessments will be carried out by the Executive Team, evaluating actions previously completed alongside any further propositions.

We've assessed the risks of modern slavery and human trafficking as follows:

High risk activities

We don't believe there are any high-risk operations within the work of the organisations and its supply chain with regards to modern slavery and human trafficking.

Medium risk activities

Supply chains linked to the house building and property maintenance because of the organisations' reliance upon external contractors to undertake a high percentage of our building and maintenance work.

Retail and commercial spaces let to independent business tenants operating a wide range of activities unconnected to Golding Homes.

Low risk activities

Supply chains in the provision of agency staff (professional, administrative, support services and operatives).

As we're based in and operate solely within the UK, we've identified that our overall exposure to the risk of slavery and human trafficking is quite low. However, within our business, particular attention is paid to the use of sub-contracted labour.

We already take action to ensure that we are compliant with employment law. Many of our contractors and suppliers are in the UK and are also required to follow UK employment law.

Provision of housing

As a housing provider, we'll consider applicants for our homes in line with our letting and allocation policy and, where disclosed to us, review risks to those we house. We'll also seek to ensure, through risk-based tenancy audits, our properties aren't used for the purposes of trafficking or allowing modern slavery. We also work closely with local authorities and community safety units to be informed of any suspected activity or concerns.

Due Diligence

We're committed to ensuring that there is no modern slavery in our supply chains or in any part of our organisation. Our systems and controls to identify and mitigate risk during procurement, either from a framework, or by buying direct from the open market, include:

a Supplier Code of Conduct, which requires our partners to sign up and commit to ensuring that no modern slavery activities are carried out within their supply chain. This includes reference to no forced or involuntary labour, humane treatment, workplace equality, freedom of movement and personal freedom and other expected values and employment practices. These requirements are included in our contracts with all suppliers.

standard terms and conditions of purchase, which make more explicit reference to the Modern Slavery Act 2015, as well as social and labour law more generally.

our Procurement Policy and Framework, which ensures that our commitment to preventing slavery and human trafficking is clear and setting out our expectations of contractors and suppliers.

the Procurement Act comes into effect on 28 October 2024. The Act will bring in new regulations where if a company is found guilty of breaching modern slavery requirements, they will be excluded from all procurement activity until the issue is resolved or they have paid a fine etc, as required.

As an employer, we're committed to paying the National Living Wage and we regularly review our terms of employment to ensure that they comply with all relevant legislation.

During the recruitment process, we conduct thorough checks to ensure that our colleagues have the relevant documentation and have the right to work in the UK.

Training

We continually seek ways to raise our colleagues' awareness of the risks of modern slavery and human trafficking via our learning programmes and our communication channels. We'll continue to provide relevant information and training to colleagues during 2024/25 on the topic as part of our ongoing work to manage these risks, such as raising awareness of the links with money laundering and human trafficking, and what we can do to prevent it. These currently form part of our mandatory training requirements that all colleagues must complete on an annual basis.

In 2023/24 we refreshed our e-learning on slavery and human trafficking to ensure this continues to cover all relevant requirements. This will become a minimum learning requirement for all our colleagues to help raise awareness. In 2024/25, we'll supplement this with bespoke training and awareness developed with our partners, for front line customer facing services.

Relevant policies

All policies are regularly reviewed by Executive Team under a delegated authority from the Board. All policies are reviewed on a rolling basis in response to longevity, audit, statutory or regulatory change and customer and partner feedback.

Golding Homes operates the following policies that encompass our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Procurement Policy

We'll only trade with those who comply with our statement on Modern Slavery (as defined in our Code of Conduct for Partner Organisations). Our Procurement Policy states that we work or contract with suppliers who share our values and policies in line with Modern Slavery Act 2015. All third parties must complete an approved supplier form before we will work with them, as part of this process they must self-certify they have Modern Slavery policy, or they will follow ours. We'll assess any instances of non-compliance, take appropriate action and report these to the Board. There were no instances of non-compliance during the period covered by this statement.

Whistleblowing policy

We encourage all colleagues, customers, and other business partners to report any concerns related to the direct activities, or the activities of our supply chains. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.

NHF Code of Conduct

We've adopted the 2024 NHF Code of Conduct, which makes it clear to colleagues the actions and behaviour expected of them when representing the organisation. We aim to maintain the highest standards of employee conduct and ethical behaviour when working or managing our supply chain.

Recruitment Policy

We operate a comprehensive and transparent recruitment policy which is subject to the oversight of the People team and periodic internal audit.

Safeguarding and Domestic Abuse Policies

Our Safeguarding and Domestic Abuse policies guide and support our work on protecting vulnerable people from abuse in its widest sense. In 2024/25 we'll continue to focus on strengthening our approach to safeguarding including developing tools and policies where necessary to help address any areas in need of improvement.

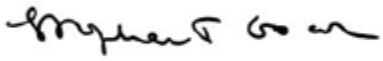
Our effectiveness in combating slavery and human trafficking

Our Human and Slavery Trafficking Statement 2024/25 has been reviewed and developed with due regard to good practice issued by the Home Office.

Any suspected incidence of slavery or human trafficking must be immediately reported to the Executive Team in the first instance. It'll then be dealt with appropriately and reported to the Board and local authorities as necessary.

Through effective monitoring we work to ensure that modern slavery due diligence is a business as usually activity and that there is a good level of awareness and vigilance across our organisation and our front-line services in particular. In 2024/25 we'll look at further improving processes for the contract management of our supply chain and continue to build on our procurement service so that, through good supplier management, we can ensure our supply chains are completely ethical.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st March 2024.



Stephanie Goad

Chief Executive

Date: 11 June 2024