Modern Slavery and Human Trafficking Statement 2024/25
Golding Homes

1. Our Commitment

At Golding Homes, we are committed to playing our part in eradicating modern slavery and human trafficking. As a responsible housing provider and employer, we understand the importance of maintaining vigilance and integrity across our operations and supply chains.

This statement outlines the steps we have taken in 2024/25 to prevent modern slavery and sets out our continued priorities for the year ahead. Our approach is guided by the Modern Slavery Act 2015, and we are committed to improving year on year.

This statement is made on behalf of the Golding Homes Group. Golding Homes, as the parent company, is the entity legally required to publish the statement.

2. Who We Are

Golding Homes is a housing association operating in Kent and the Southeast of England. We own and manage over 8,500 homes and support more than 20,000 people. Our core work includes the development, letting, and management of affordable housing for rent and shared ownership.

We employ over 300 colleagues and work with a wide network of suppliers, contractors, and service providers across housing development, maintenance, IT, professional services, and facilities management. We also lease commercial units to a range of independent businesses.

We remain committed to ensuring that everyone we work with shares our values of fairness, dignity, and respect.

3. Our Risk Profile

Golding Homes' risk exposure to modern slavery remains relatively low due to the nature of our business and our UK-based operations. However, we continue to take a risk-based approach to ensure oversight where there may be indirect vulnerabilities.

Higher focus areas include:

- Construction and repairs, where subcontracting and temporary labour are common
- Tenancies in commercial units, where we have limited day-to-day oversight of business activity

Lower risk areas include:

- Direct employment of colleagues and use of agency professionals
- General business operations, which are UK-based and follow regulated employment practices

While we do not believe that modern slavery is present in our organisation or immediate supply chain, we are not complacent. We recognise that exploitation can occur in hidden or complex ways, and we remain alert to warning signs.

4. Taking Action: What We've Done in 2024/25

4.1 Supply Chain and Procurement

- We updated our **Procurement Policy and Framework** to reflect the **Procurement Act 2023**, which introduces new exclusion grounds for suppliers found in breach of modern slavery laws.

- All suppliers are now required to **self-declare compliance** with our updated **Supplier Code of Conduct,** which sets clear expectations around forced labour, ethical employment, humane treatment, and personal freedoms.

- As part of the supplier onboarding process, we request evidence of a modern slavery policy. Where suppliers do not have one, they must confirm in writing that they will comply with Golding's policy.

- We continued to use standard contracts that explicitly reference obligations under the **Modern Slavery Act 2015** and wider employment legislation.

4.2 Recruitment and Employment

- We continue to pay at least the National Living Wage and require all colleagues to provide evidence of their right to work in the UK.

- Our recruitment policy remains rigorous, ensuring that hiring practices are fair, transparent, and lawful.

4.3 Housing Management

- We have commenced a silent voices programme to help us identify households where there may be safeguarding risks including exploitation or trafficking. This supports our current work to undertake intelligence led tenancy audits where welfare concerns are raised.

- Our teams continued to work closely with local authorities and community safety partners to share intelligence and respond to concerns.

- We've strengthened safeguarding links between our neighbourhood advisors, our newly introduced Safer Neighbourhoods team, and external agencies.

5. Building Awareness

Training and awareness remain central to our preventative approach. In 2024/25:

- Customer-facing teams received targeted briefings on such as domestic abuse, and vulnerability, indicators linked to money laundering,

- We enhanced the use of toolbox talks for operatives working in repairs, maintenance, and cleaning services, helping raise practical awareness of modern slavery risks in day-to-day roles.

These actions support our commitment to ensuring all colleagues understand how to identify and respond to concerns, especially in customer facing roles.

6. Governance and Policies

Our Executive Team oversees the delivery of this agenda, with policy oversight and assurance provided by internal audit and delegated board authority.

Key policies that support our commitment include:

- **Procurement Policy**

- **Supplier Code of Conduct**
- **Recruitment Policy**
- **Safeguarding and Domestic Abuse Policy**
- **Whistleblowing Policy**
- **NHF Code of Conduct (2022)**

These policies are reviewed on a rolling basis to reflect legislation, customer feedback, and good practice.

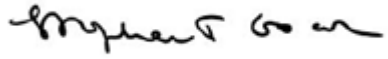
7. Effectiveness and Next Steps

In 2024/25, there were no reports or confirmed incidents of modern slavery linked to our business or supply chain.

To strengthen our position further, we will, through 2025/26:

- Review and refine our **contract management processes** to monitor supplier compliance more robustly
- Roll out **enhanced safeguarding training** with a focus on exploitation awareness
- Continue monitor working practices in line with the **Procurement Act** and our updated procurement documentation and practices
- Refresh our internal risk register to ensure modern slavery risks remain visible and well-managed

Approval and Statement of Compliance
This statement is made pursuant to section 54(1) of the **Modern Slavery Act 2015**. It has been reviewed and approved by the Board of Golding Homes and will be reviewed annually.



Stephanie Goad
Chief Executive
Date: 1 July 2025