

Modern Slavery and Human Trafficking Statement 2025/26

Golding Homes

1. Our Commitment

Golding Homes is committed to preventing modern slavery and human trafficking in all its forms. We recognise that modern slavery is a hidden crime that can affect individuals, communities and supply chains, and we are committed to playing our part in identifying, preventing and responding to the risks.

As a responsible housing provider and employer, we continue to strengthen our approach by embedding ethical employment practices, robust procurement arrangements and effective safeguarding across our organisation. We recognise that, whilst our direct exposure to modern slavery remains low, housing providers have an important role in identifying exploitation within our communities and ensuring that those we work with operate responsibly.

This statement sets out the steps we have taken during 2025/26 to minimise the risk of modern slavery within our organisation and supply chains, together with our priorities for the year ahead. It is published in accordance with Section 54 of the Modern Slavery Act 2015.

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

2. Who We Are

Golding Homes is a housing association operating across Kent and the Southeast of England. We own and manage more than 8,500 homes and provide services to over 20,000 customers through affordable rent, shared ownership and community investment.

We employ more than 300 colleagues and work with a broad range of suppliers, contractors and professional partners across construction, repairs and maintenance, development, facilities management, information technology and corporate services. We also lease commercial premises to a variety of independent businesses.

Everything we do is underpinned by our commitment to treating people with dignity, fairness and respect. These values shape the way we work with our colleagues, customers, contractors and partners.

3. Understanding Our Risks

We continue to assess the overall risk of modern slavery within our operations as relatively low due to the nature of our UK-based business, established employment practices and regulated operating environment. However, we recognise that risks can exist within complex supply chains and communities and therefore maintain a risk-based approach.

Areas receiving increased focus include:

- Development and responsive repairs, where subcontracting and temporary labour are more common.

- Procurement of goods and services through extended supply chains.
- Commercial tenants, where we have limited day-to-day oversight of employment practices.
- Safeguarding concerns within our communities, including exploitation, county lines activity, cuckooing and human trafficking.

Lower-risk areas include:

- Direct employment of colleagues.
- Agency workers engaged through approved recruitment providers.
- Our day-to-day corporate operations, which operate within established UK employment legislation.

Whilst we have no evidence of modern slavery within our organisation or immediate supply chain, we recognise that exploitation can often remain hidden. We therefore remain vigilant and continue to strengthen our controls and awareness.

4. What We Have Done During 2025/26

Procurement and Supply Chain

Throughout 2025/26 we continued embedding the requirements of the Procurement Act 2023 within our procurement arrangements.

Our approach included:

- Continuing to require suppliers to confirm compliance with our Supplier Code of Conduct, including expectations relating to modern slavery, forced labour, ethical employment and workers' rights.
- As part of our tender process, requiring prospective suppliers to complete a Suitability Questionnaire. This provides assurance that suppliers have appropriate safeguarding policies, procedures and governance arrangements in place, including measures to prevent modern slavery and protect vulnerable people.
- Continuing to include contractual obligations relating to compliance with the Modern Slavery Act 2015 and wider employment legislation.
- Strengthening contract management arrangements to improve ongoing oversight of supplier compliance and identify opportunities for further assurance.

Recruitment and Employment

We continue to maintain fair, transparent and lawful recruitment practices.

During the year we:

- Continued to verify every colleague's right to work in the UK before employment commences.
- Maintained robust recruitment and pre-employment checking processes.

- Continued paying at least the National Living Wage.
- Promoted a culture where colleagues can confidently raise concerns through our Whistleblowing Policy and other reporting mechanisms.
- Continued to encourage managers to hold regular one-to-one meetings with their team members, ensuring wellbeing, workload and any concerns are discussed as part of those conversations.

Housing Management and Safeguarding

Housing providers have a unique opportunity to identify signs of exploitation within communities.

During 2025/26 we continued to strengthen our safeguarding approach by:

- Further embedding our Silent Voices programme to help identify households where hidden vulnerabilities or exploitation may be present.
- Strengthening the way we identify potential exploitation by bringing together information from our housing teams, safeguarding activity and external partners to support early intervention where concerns arise.
- Strengthening partnership working with local authorities, the police, safeguarding boards and community safety partners.
- Continuing to develop collaborative working between our Neighbourhood teams, Safer Neighbourhoods team and specialist safeguarding colleagues to ensure concerns are identified and escalated appropriately.

5. Building Awareness

Raising awareness remains one of the most effective ways of preventing modern slavery.

During 2025/26 we continued to improve colleague awareness through targeted learning and communications, including:

- Safeguarding briefings for customer-facing colleagues.
- Training covering indicators of exploitation, vulnerability and appropriate reporting routes.
- Toolbox talks for colleagues and contractors working within repairs and maintenance services.
- Reinforcing the role every colleague has in recognising concerns and taking appropriate action.

We remain committed to ensuring colleagues understand both the indicators of modern slavery and the processes for reporting concerns safely and confidently.

6. Monitoring and Assurance

We continue to strengthen our governance arrangements to provide assurance that our controls remain effective.

During the year we monitored our approach through:

- Procurement and supplier due diligence activities.
- Contract management and supplier performance reviews.
- Safeguarding reporting and partnership working.
- Corporate risk management processes.
- Whistleblowing arrangements and internal reporting mechanisms.
- Regular policy reviews to ensure compliance with legislative and regulatory requirements.

No confirmed cases of modern slavery were identified within our workforce or immediate supply chain during 2025/26. However, we recognise that an absence of reported incidents does not necessarily indicate an absence of risk and therefore continue to focus on prevention, awareness and early identification.

7. Governance and Policies

Responsibility for preventing modern slavery is shared across Golding Homes. Oversight is provided by the Executive Team, with assurance through our governance arrangements and Board oversight.

Our approach is supported by a range of organisational policies, including:

- Procurement Policy
- Supplier Code of Conduct
- Recruitment Policy
- Safeguarding and Domestic Abuse Policy
- Whistleblowing Policy
- Code of Conduct

These policies are reviewed regularly to ensure they remain aligned with legislation, good practice and organisational priorities.

8. Priorities for 2026/27

During 2026/27 we will continue to strengthen our approach by:

- Further developing supplier assurance and contract monitoring arrangements.
- Reviewing the effectiveness of our Supplier Code of Conduct.

- Continuing to embed modern slavery considerations throughout procurement and contract management activities.
- Delivering ongoing safeguarding and exploitation awareness training for colleagues.
- Strengthening employee voice and creating an environment where colleagues feel able to speak up about both personal and professional matters.
- Continuing to use information from tenancy management, safeguarding activity, neighbourhood services and partner agencies to identify potential signs of modern slavery, exploitation and other safeguarding concerns at the earliest opportunity.
- Reviewing emerging legislation and sector good practice to ensure our approach remains proportionate and effective.
- Keeping our corporate risk assessment under regular review to ensure modern slavery risks remain visible and appropriately 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: July 2026