



Modern Slavery and Human Trafficking Statement 2024/2025

Purpose of Statement

This statement is made in accordance with the Modern Slavery Act 2015 on behalf of Notting Hill Genesis and all legal entities that are part of our group. Please see our annual report and financial statements for a complete list of all our subsidiary organisations.

Organisation

We are one of the largest housing associations in London and the surrounding areas and are committed to doing all we can to prevent slavery and human trafficking in our organisation and supply chain. On 28 May 2019, we became a signatory to the Modern Slavery Act 2015 showing our committed to conducting business ethically and with integrity.

Policies

We have a robust framework of policies in place to support detection and prevention of slavery and human trafficking. These policies include:

- Allocations and lettings
- Anti-bribery
- Anti-fraud
- Anti-money laundering
- Code of conduct for employees
- Code of conduct for contractors
- Equality, diversity, and inclusion
- Procurement
- Recruitment
- Safeguarding adults
- Safeguarding children and young persons
- Tenancy fraud and unauthorised occupants
- Whistleblowing
- Young people at work

Colleagues

We employ over 1,600 people and our employment policies and procedures ensure that all of our employees have the legal right to work and are employed in accordance with labour laws.

We empower our workforce to identify slavery and human trafficking through training and awareness programmes. If an employee were to become a victim of slavery or human trafficking, they would be able to access support through our independent and confidential employee assistance programme.

We consider the overall risk of slavery and human trafficking in our operations to be minimal. However, we are committed to staying alert and taking immediate action in the event of any compliance breach, including involving the appropriate authorities and applying lessons learned to prevent future incidents.

Residents

We recognise that some of our residents may be vulnerable to slavery and human trafficking. All of our resident-facing staff receive safeguarding training on how to identify abuse and to take the appropriate action.

Supply Chain

Our supply chain is extensive with goods and services sourced directly, and indirectly from more than 1,400 suppliers; the vast majority of which are based in the UK. The volume of suppliers, focus on construction sector, and high-level of indirect spend, are our key supply chain risk factors for slavery and human trafficking. We work in partnership with our contractors, joint ventures, subsidiaries, and our suppliers to implement risk mitigation actions and address any concerns.

To mitigate the risk in our supply chain we conduct an annual audit of our top 100 suppliers with a turnover of more than £36 million which includes ensuring they have a published modern slavery statement. We also ask new suppliers to confirm they are not engaged in, or subject to any investigation related to, slavery or human trafficking. Our standard contracts include requirements for suppliers to reduce the risk of slavery and human trafficking in their businesses and supply chain.

Training

All staff are required to complete an eLearning course on Modern Slavery and Human trafficking, and to refresh their knowledge at least every three years. We also have guidance available on providing support to victims.

Approval

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 on behalf of Notting Hill Genesis and all legal entities that are part of our larger group. Please see our annual report for a list of our subsidiary organisations.

Approved July 2024 by the executive board for Notting Hill Genesis approved this statement for the fiscal year ended 31 March 2024.

Signed:

Patrick Franco

Chief Executive Officer