



## Modern Slavery Statement

**This statement is made in respect of Golden Lane Housing Limited 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**

### Introduction

Golden Lane Housing is making a voluntary statement as regards the Modern Slavery Act 2015.

Until 31 March 2021, Golden Lane Housing was part of the Royal Society Mencap group, and the activities and actions in this statement relate to Golden Lane Housing and not the Royal Mencap Society group during the financial year 1 April 2020 to 31 March 2021.

This statement also reflects our intentions for the coming year.

We are committed to preventing slavery and human trafficking in all of our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

We seek to understand the potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking at Golden Lane Housing or its supply chains.

We will look forward to the coming year with a commitment to continue our activity to meet and exceed our legal and moral obligations.

### Our Vision and Values

Our vision is a world where everyone with a learning disability has opportunities to access good quality housing that meets their needs.

Our values are people focussed and include being a caring organisation that listens, is reliable and honest. Working creatively to achieve great results.

We focus on treating everyone fairly and understanding their diverse needs.

Reflecting this in both our vision and values, we are pleased to be publishing our annual Modern Slavery and Human Trafficking Statement for this financial year.

### Organisational structure

In the last financial year we were a subsidiary of the Royal Mencap Society group and up until September 2021 we were also a registered charity and limited company. We are now an independent charitable Community Benefit Society.

Our primary regulator is the Regulator of Social Housing.

We own and manage homes providing over 2,300 tenancies for people with a learning disability or autism.

### **Our Supply Chain**

Our principal services are providing and developing social housing. Our procurement focus reflects what we do and what we require of our business partners. Up until 31<sup>st</sup> March 2022 our IT, Finance and Human Resources functions were largely supplied through the Royal Mencap Society. In sourcing and replacing the provision of those services we have utilised sector frameworks that have robust processes for screening the suppliers whose services are available to us. We have also sought, where we can, to use local suppliers such as Quadris: our IT infrastructure provider, where we can ensure we are able to undertake due diligence and visit the suppliers premises.

We ask bidders as part of the procurement process what they do to ensure their own business and supply chain is free from modern slavery. Where this cannot be evidenced to the satisfaction of Golden Lane Housing, we would actively look to exclude the supplier from further involvement in a tender process.

### **Responsibility**

The Executive Directors for Finance and Operations have responsibility for implementing our approach to anti-slavery initiatives, being the principal areas of focus for supplier due diligence and procurement.

### **Relevant Policies**

We operate the following policies:

Code of Conduct – we strive to maintain the highest standards of employee conduct and ethical behaviour in delivering our services and managing our supply chain. The Code of Conduct is based on the National Housing Federation model and clearly defines what is expected of our colleagues when representing Golden Lane Housing.

Recruitment and Employment – we will undertake all relevant pre-employment checks prior to colleagues being employed. Throughout the whole recruitment process and into the employment relationship, we pride ourselves on providing a safe environment, free from inequalities, where employees' wellbeing is supported by responsible and inclusive employment practices.

We use employment agencies that are committed to the principles of fair and transparent recruitment processes in the provision of agency colleagues. Agency workers appointed are subject to a range of checks.

As part of the Royal Society Mencap group our colleagues have all been subject to high level Disclosure and Barring Service (DBS) checks. We will continue to ensure that all future colleagues receive a DBS check. We also intend to carry out essential right to work checks.

As an example of our commitment to fair employee treatment, all of our colleagues receive at least the National Living Wage.

Safeguarding – we have a robust approach to safeguarding and training is consistently delivered to all colleagues as well as our Board. We will ensure we continue to raise and maintain colleague awareness of the risks of slavery and human trafficking through cyclical mandatory safeguarding training and regular updates.

We remain committed to the highest standards of quality, probity, openness and accountability and as part of this commitment, we provide a confidential reporting process for colleagues to report serious concerns about any aspect of our work which includes abuse or neglect of vulnerable people.

We also provide a confidential external facility for colleagues to raise concerns on poor practices that may harm tenants or members of the public. The Vice Chair of the Board acts as a senior independent Board Member with whom colleagues can raise concerns if they are unable to speak to managers.

Golden Lane Housing is an affiliate and supporter of the Ann Craft Trust and participates in the National Adult Safeguarding Week.

We work closely with the police and local authorities to support any potential victims in securing accommodation and we are a member of the Somerset Safeguarding Adults Board.

### **Due Diligence**

The following actions to mitigate the risk of slavery or human trafficking in the delivery of its services and supply chain:

- We have sourced many of services from the Royal Mencap Society which is a known and trusted supplier and ethical charity.
- Where we have replaced Royal Mencap Society services we have ensured we use frameworks where all suppliers and contractors must be compliant with legislative requirements as a condition of business and additional due diligence has taken place.
- We undertake a range of due diligence checks on suppliers that whilst not directly related to Modern Slavery, may be an indicator of poor practice or flag up a concern for additional focus to be placed upon the organisation under review.
- Where appropriate, we ensure our Safeguarding training to our colleagues gives guidance to colleagues on the identification and reporting that could indicate safeguarding issues, modern slavery or human trafficking.

### **Scheduled activity for 2022/2023**

We will adjust our safeguarding focus to better increase awareness amongst all colleagues our customers and our Board.

Our communications team will actively support in the promotion of the Anti-Slavery Day on the 18<sup>th</sup> October 2021.

We will introduce a revised procurement approach that will ensure clear and transparent contracting with reputable suppliers. We will continue to utilise frameworks that ensure supplier due diligence forms part of the process of achieving a place on the framework.

We will issue a questionnaire to all suppliers asking for confirmation that they comply with the Modern Slavery Act.

### **Statement Approval**

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

**Signed: John Verge**

**Chief Executive Officer:**

A handwritten signature in black ink, appearing to read 'J. Verge', written over a horizontal line.

**Dated: 16<sup>th</sup> June 2022**