



Anti-Slavery and Human Trafficking Statement 2024-25

Introduction

Modern slavery is a crime and violation of fundamental human rights. It includes recruitment, movement, harbouring, or receiving of humans using force, coercion, abuse of vulnerability, deception, or other means for the purpose of exploitation.

Human trafficking is the trade of humans for the purpose of forced labour, sexual slavery, or commercial sexual exploitation.

We remain committed to transparency, changing lives, and playing our part in eliminating modern slavery; this is the second statement for Southern Housing as a merged organisation. The statement highlights:

- The actions we continue to take to combat modern slavery
- Progress made during the financial year 2023-24
- What we plan to focus on in 2024-25.

No instances of modern slavery were identified in our operations or supply chains during the 2023-24 financial year.

Business structure and operations

Southern Housing is one of the largest housing providers in the UK, formed in December 2022. The Company structure comprises 18 subsidiaries and four joint ventures. We offer a range of services, including traditional social housing, shared ownership, affordable rent, private market rent, student accommodation, care and support, and outright sales.

Our vision is to create communities where everyone has a safe home in a place they're proud to live. We own around 77,000 homes and serve 167,000 residents across London, the south-east, the Midlands, and the Isle of Wight. We employ around 2500 people.

We are committed to acting ethically and with integrity in all our relationships, taking a zero-tolerance approach to modern slavery and human trafficking. We implement and enforce effective systems and controls to ensure no such activity is taking place in any part of our business or anywhere in our supply chains, in accordance with the [Modern Slavery Act 2015](#).

As part of this commitment, we have formed a multi-disciplinary **Modern Slavery Working Group**. The group works collaboratively across the organisation and in partnership with

stakeholders and residents, including our Board Equality, Diversity & Inclusion Champion. The working group provides oversight and contributes to continuous learning, monitoring, evaluation, and scrutiny of our policies and organisational practices to ensure we comply with all relevant legislation.

Our Board and Chief Executive are responsible for:

- Overseeing our modern slavery and human trafficking approach
- Risk management
- Approving our Anti-Slavery and Human Trafficking Statement and Policy.

Our Executive Director of People and Culture:

- Is responsible for implementation of our modern slavery approach
- Owns the statement and budget.

Due diligence

We recognise the damaging impact of modern slavery and human trafficking on global society, and we're committed to playing our part in combatting it.

We achieve this through our due diligence processes by:

- Publishing our annual Anti-Slavery and Human Trafficking Statement
- Having in place a robust management framework to ensure we only engage with suppliers and contractors who confirm their compliance with the [Modern Slavery Act 2015](#)
- Being aware of high-risk areas of our business where we might encounter slavery and human trafficking and closely monitoring activities linked to housebuilding, property maintenance, estate services, care and support, IT, and temporary staff
- Ensuring our contracts contain modern slavery clauses to reduce the risk of it occurring in our supply chains
- Incorporating modern slavery and human trafficking in our risk management framework
- Raising awareness and providing learning opportunities with a view to develop clear understanding of what modern slavery is, what it looks like and how to prevent it from occurring in our business and supply chains
- Reviewing and applying our policies and practices such as recruitment, procurement, safeguarding, pre-employment and code of conduct as well as our Anti-Slavery and Human Trafficking Policy.

Policy framework and compliance

The [Modern Slavery Act 2015](#) requires organisations operating in the UK to commit to tackling slavery and human trafficking. Southern Housing is legally required, under section 54 - *transparency in supply chain*, to publish an annual statement detailing our progress in preventing modern slavery in our business and supply chain.

We have developed our **Anti-Slavery and Human Trafficking Policy** which outlines our approach to tackling and preventing modern slavery in our business and supply chain. While not a legal requirement, this is our further commitment towards tackling modern

slavery. The Policy sets out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking.

Our Anti-Slavery and Human Trafficking Policy is supported by other related internal policies which set out the basis or culture of acting ethically and in accordance with highest professional standards. The below listed related policies are accessible to all our colleagues through our intranet:

- Whistleblowing Policy & Procedure
- Safeguarding Policy and Procedure
- Anti-Bribery Policy
- Code of Conduct
- Incident Reporting
- Equality, Diversity & Inclusion Policy
- Procurement Policy
- Recruitment Policy.

Risk and supply chain management

The UK is perceived as a low-risk country for modern slavery, and we have also assessed our risk as low. Despite this, we have identified possible or likely areas that may increase the possibility of modern slavery such as:

- Supply chains
- Property and estate maintenance
- Construction
- Labour intensive services procured directly or indirectly
- In homes where vulnerable residents may reside
- In properties that have been sublet or taken over.

To mitigate these risks, we've put controls and actions in place, including:

- Putting the right safety mechanisms in our procurement framework and contracts
- Increasing awareness and vigilance amongst colleagues who are in contact with service providers on our estates and construction sites, through ongoing campaigns and training
- Engaging only with suppliers and contractors who confirm their compliance with the [Modern Slavery Act 2015](#)
- Increased vigilance and awareness amongst our colleagues, residents, and suppliers
- A reporting system to identify overcrowding and neighbour nuisance issues as well as safeguarding concerns
- Conducting pre-employment checks on all colleagues and only engaging with agencies who do similar checks, confirmed in contracts with them.

Actions to assess and address risks of modern slavery

Baseline - actions we took in previous years

Southern Housing was formed in December 2022 as a result of a merger between Optivo and Southern Housing Group. Both legacy organisations were committed to the [Modern Slavery Act 2015](#) and achieved the following:

- Maintained clear risk management arrangements for the purposes of ensuring the effective identification, monitoring, and management of risk across the business including those associated with modern slavery and human trafficking. A risk and assurance framework was in place to capture and manage risks.
- Regularly reviewed the organisation's policies and procedures which were designed to ensure we maintained our high standards of probity, accountability, and openness. This mitigated the risk of unknowingly harbouring illegal, unethical, or improper conduct. We continued to ensure our safeguarding and domestic abuse policies, procedures, and training encompassed modern slavery.
- Made relevant pre-employment checks such as 'right to work in the United Kingdom' checks and worked only with reputable agencies
- Paid all employees either the London Living Wage or UK Living Wage Foundation rates as a minimum for their basic salary and made payments directly to colleagues
- Provided an independent Employee Assistance Programme
- Engaged only with suppliers who complied with the [Modern Slavery Act 2015](#) and conducted robust due diligence to assure ourselves via requirements to answer specific government recommended questions on modern slavery prior to agreeing contracts
- Published our annual Anti-Slavery and Human Trafficking Statement on our website
- Introduced new case types to our anti-social behaviour system to include cuckooing, gang activities, and modern slavery. The new categories helped us to identify county lines activity and support potential victims of such activity.
- Committed to reporting any attempted or actual breaches to the Audit and Risk Committee and Board (zero instances were recorded)
- Maintained our links with other housing associations to share information about best practices in tackling modern slavery
- Encouraged reporting of concerns related to our own activities or our supply chain through our whistleblowing policies.

Progress made during the financial year 2023-24

We continued to undertake all the activities we carried out in previous years and in addition we achieved the following:

- Re-launched the Modern Slavery Working Group, chaired by the Director of People Services and sponsored by the Executive Director of People and Culture. We revised its Terms of Reference.
- Included a link to the Anti-Slavery and Human Trafficking Statement on our new website homepage and published our statement on the government's registry

- Developed an action log to monitor our effectiveness in ensuring that slavery and human trafficking is not taking place in our business or supply chains. Key areas we focus on are:
 - policies
 - risk management
 - supply chain management
 - safeguarding
 - resident involvement
 - people process
 - training
 - communication with colleagues and residents.
- Established key outcomes to measure and evaluate our progress
- Continued knowledge and awareness building of modern slavery by creating a dedicated page on our intranet and publishing articles, podcasts, and links to other related resources
- Developed an e-learning programme for colleagues to:
 - further improve understanding of the implications of the [Modern Slavery Act 2015](#)
 - know what they should do to recognise and report potential concerns.
- Liaised with the Safeguarding Team to ensure our reporting system is in place and communicated to residents and colleagues.

Our plans for 2024-25

We will continue to undertake all the activities we carried out in previous years and in addition we will focus on:

- Working collaboratively with the Procurement Team on the review of our Supply Chain Management to ensure we only engage with contractors who confirm their compliance with the [Modern Slavery Act 2015](#)
- Improving visibility of our suppliers' full supply chains to provide transparency regarding how suppliers monitor their sub-contractors
- Increasing resident and customer awareness on how to spot the signs of modern slavery and what to do when people have concerns. This will include resident involvement and targeted campaigns in areas where the possibility of modern slavery is higher.
- Ensuring all colleagues are aware of how to spot the signs of modern slavery and what to do when they have concerns. This includes use of different media, further promotion of resources available such as our dedicated modern slavery intranet page as well as e-learning for general awareness and developing further bespoke training for colleagues in higher-risk roles for in-depth learning of:

- the subject of modern slavery and human trafficking
 - what forms it takes
 - how to spot the signs
 - how to report concerns.
- Communicating and ensuring awareness of our Southern Housing Anti-Slavery and Human Trafficking Policy and Procedure which confirm our zero-tolerance approach to modern slavery
 - Providing quarterly safeguarding reports to senior managers across the organisation; Regional and Resident scrutiny panels as well as six-monthly report to Executive Team and an annual report to the Board
 - Organising an annual anti-slavery activity on 18 October to raise awareness and link with other related events throughout the year.

This statement

This statement applies to Southern Housing and all its subsidiaries for the financial year ending 31 March 2025. We will review this statement annually to address legislative, regulatory, best practice, or operational changes.

Controls

Version 2.0 – effective 1 April 2024