Modern Slavery Act 2015 Statement

Introduction by Howard Sinclair, Chief Executive

We are proud of the steps we take to tackle modern slavery and human trafficking both in our supply chains and in terms of the support we provide to people who have experienced or are at risk of homelessness. We are committed to reviewing and continually improving our practice in this area year on year.

St Mungo’s Structure

We are a housing association and charity providing homelessness services across the South of England. We are the parent company of Broadway Homelessness and Support and Street Impact Limited. The Group has approximately 1,500 staff and operates in the South of England.

We run a wide range of services—these include outreach services to help people sleeping rough leave the streets, advice services to prevent homelessness and the health, wellbeing, learning and skills services that enable our clients to recover from homelessness and rebuild their lives. Some, but not all, of these support services are linked to residential projects such as our hostels and supported housing.

St Mungo’s owns 62 properties ranging from modern hostels to supported housing and care homes. We also lease and manage many other buildings where this helps us deliver services for our clients.

St Mungo’s has a global annual turnover of £89.6m.

We spend more than £22m on our third party supply chain.

Our Supply Chain

St Mungo’s does not operate an extensive, worldwide supply chain. Due to this we are able to build close relationships with suppliers which enable us to promote our commitment with regards to social value and responsibility, living wage, sustainable procurement, a focus on supporting the local economy when possible and to work with our supply chain providers to zone out and, when possible, fully eliminate slavery and human trafficking.

Our largest areas of spend are utilities, property repair and maintenance services, agency staff working in our housing support and care services, and IT services.

Our approach to preventing modern slavery and human trafficking

The Modern Slavery Act 2015 requires all public bodies and their partners to adopt policies and practices which proactively tackle modern slavery and human trafficking. St Mungo’s is committed to ensure this is monitored throughout our organisation and
the supply chain, expecting that all our supply chain providers and their subcontractors apply such practices. We expect all our staff to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure such practices are understood, reported and identified and tackled effectively. Our new Procurement and Contracts Regulations, St Mungo’s Procurement Strategy, the Ethical Procurement Policy and contract management guidance and tools have been communicated to raise awareness and compliance across our managers, staff and the supply chain.

As part of our initiative to identify and mitigate risks:

**Our Staff**

We have clear recruitment procedures and processes including Right to Work checks for all permanent and interim staff. We pay at least the London Living Wage in all our London-based services. We pay at least the living wage in other regions we work in.

Wherever possible, we ensure that any recruitment partners we use for temporary staff pay the London Living Wage in our London-based services. Our national and regional partners apply living wage standards. We also ensure that these partners apply HR good practices and processes including Right to Work checks and St Mungo’s has access to these records and carries out regular audits to ensure they are up to date and accurate.

**Procurement**

We have a clear procurement policy, with regularly reviewed procurement thresholds and procedures in place. Our directors, managers and staff seek to apply fair, transparent and responsible procurement practices in each stage of procurement activity.

Our procurement leadership is trained in Protecting Human Rights in the Supply Chain and the procurement team complete an annual ethical test in line with the requirements of the best practices set by the government and the professional body, the Chartered Institute of Procurement and Supply.

Over 90% of our repairs and maintenance contractors are members of a professional trade body, either Contractors Health and Safety Assessment Scheme or Constructionline.

All contractors are subject to robust internal checks and our main contractors also receive at least annual review meetings.

St Mungo’s is a member of a number of procurement consortia, providing access to suppliers who have been checked for their compliance with ethical procurement standards. We are an affiliated member of *Electronic Watch*. This is an independent monitoring organisation which helps public sector buyers meet their responsibility to protect the labour rights of workers in global electronics supply chains.

**Whistleblowing**

St Mungo’s has a Whistleblowing procedure where staff can raise concerns freely. Investigations are heard by a senior member of staff, at least at Executive level or by the Board.
Code of Conduct

All St Mungo’s managers and staff have to adhere to a Code of Conduct which clearly sets out expected standards of behaviour. The Code requires staff to act with honesty, integrity, report misconduct and take responsibility for safeguarding.

Safeguarding

As part of our work we identify and support people who have experienced modern slavery and human trafficking as well as putting them in touch with specialist organisations who can provide further advice and support. We have comprehensive Adult and Child Safeguarding procedures, Safeguarding and Professional Boundaries e-learning and classroom-based training, all of which include slavery and human trafficking. There is board and senior management oversight of safeguarding incidents; and a named Safeguarding Lead and Deputy Lead for the organisation. We also complete an annual review of all safeguarding cases to identify trends.

Migrant Strategy

In November 2017 we published our Migrant strategy. The key objectives of this strategy are to improve our service offer to migrants, create partnerships with those who have expertise in the field of migrant support, innovate and replicate successful service models, influence policy and practice, as well as involving our clients in the delivery of this strategy.

Partnership Working and Learning from Specialist Agencies

At a local level, our managers are involved in various initiatives to prevent modern slavery and human trafficking. For example, we are involved in the Tri-Borough Outreach Anti-trafficking Protocol and Tri-Borough Modern Slavery operational meetings. We have also contributed anonymised client data to a shared research project on modern slavery and exploitation. We regularly share and promote good practice guidance from specialist agencies such as Focus on Labour Exploitation (FLEX) to improve staff expertise.

Tenancy and Licence Management

We have comprehensive referral processes into all our services, including checking proof of identity. We carry out regular checks on all clients living in our properties as part of the support we offer. This greatly minimises the risk of any of our clients living in our accommodation being subject to modern slavery or human trafficking.

Future steps

Following a review of the effectiveness of the steps we have taken in 2016-17 we intend to take the following further steps to combat slavery and human trafficking:

Communications: We will share this statement with our staff, volunteers and clients and raise awareness of the Modern Slavery Act 2015 and what action to take if staff have concerns.

Procurement: We will continue to raise awareness of the Modern Slavery Act 2015 with our suppliers by requesting relevant evidence such as their Modern Slavery
statements, Corporate Social Responsibility policies, commitment to paying a living wage, social value policies, modern slavery preventative practices and recruitment procedures as part of the procurement process. Our standard terms and conditions of contract for goods and services refer to the Act.

We will also develop a Procurement Guide and procurement training for staff, which covers the importance and benefits of ethical procurement.

**London Living Wage:** Commitment to the London Living Wage and Living Wage forms part of our tendering process. We are currently reviewing our supply chain and we plan to negotiate and retender to improve on this measure.

**Safeguarding:** We will make Safeguarding and Professional Boundaries e-learning mandatory for all staff. We will make classroom-based Safeguarding and Professional Boundaries training mandatory for all client-facing staff. We will monitor this via our ‘Solid Foundations’ compliance programme.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes St Mungo’s slavery and human trafficking statement for the financial year ending 31st March 2018.

Howard Sinclair

St Mungo’s Housing Association

October 2018