

St Mungo Community Housing Association

Modern Slavery Act 2015 Statement – 2024/25

Introduction

St Mungo Community Housing Association (St Mungo's) is proud of the steps we take to tackle modern day slavery and human trafficking. We are committed to acting ethically and with integrity in all our business dealings and to implementing effective systems and controls to ensure these crimes are not taking place anywhere within our own organisation or our supply chains. This absolute commitment to upholding human rights is further demonstrated through our work supporting individuals who have experienced, or are at risk of, homelessness. We strive to provide a safe environment and pathways to security, actively working to protect the most vulnerable in society from exploitation.

We are dedicated to continually reviewing and enhancing our efforts through regular risk assessments, supplier due diligence and staff training. This ensures our approach to eradicating modern slavery remains robust, transparent and effective year on year.

St Mungo's structure

We are a housing association and charity providing accommodation and support services across the South of England. We are the parent company of St Mungo's Homes Ltd and Broadway Homelessness and Support, both of which are dormant. We are also a shareholding partner in Social Impact Bristol, which is in liquidation. We have approximately 1800 permanent and locum members of staff and work with around 480 volunteers and 100 students per year.

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 support services including health, wellbeing, learning and skills that enable our clients to recover from homelessness and rebuild their lives. Some of these support services are linked to residential projects such as our hostels and supported housing. Last year, we supported approximately 25,000 people across 138 services, with projects designed to support a wide range of needs, from those requiring intensive support to those just needing signposting.

St Mungo's owns, manages or leases around 3,200 units in different types of accommodation ranging from hostels to supported housing and care homes.

St Mungo's has a global annual turnover of £123.6m. We spend more than £48m on our third-party supply chain.

Our supply chain

St Mungo's does not operate an extensive, worldwide supply chain. As a result, we are able to build close relationships with suppliers, enabling us to uphold our commitment to social value and responsibility, living wages, sustainable procurement, and supporting the local economy whenever possible. This also allows us to collaborate with our supply chain providers to identify and address and, where feasible, eliminate modern-day slavery and human trafficking.

Our largest areas of spend on suppliers 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 day 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 day slavery and human trafficking. St Mungo's is committed to ensuring that this is monitored throughout our organisation and supply chain. We expect all our supply chain providers and their subcontractors to apply such practices. We also 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 and, where they don't meet standards, they are identified, reported and tackled effectively. Our 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.

Communications

We share this statement with our colleagues, volunteers and clients and raise awareness of the Modern Slavery Act 2015 and what action to take if there are any concerns. This statement is placed prominently on our website www.mungos.org and is also made available for all stakeholders on the Home Office public registry.

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.

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 recruitment partners apply living wage standards. We also ensure that these partners apply good HR practices and processes including Right to Work checks. St Mungo's has access to these records and carries out regular checks to ensure they are up to date and accurate, and to confirm that our partners are held to the same high standards of compliance as we maintain. We regularly review how these records are maintained and checked, making changes to ensure compliance is maintained. Where we have any concerns, we take appropriate action with partners.

Procurement

We have a clear procurement policy, and regularly review our procurement thresholds and procedures. We seek to apply fair, transparent and responsible procurement practices at each stage of procurement activity, and endeavour to ensure that suppliers are subject to relevant checks and that our main contractors also receive at least annual review meetings.

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 Chartered Institute of Procurement and Supply.

Over 80% of our repairs and maintenance contractors are members of a professional trade body, either Contractors Health and Safety Assessment Scheme or Constructionline.

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 Policy through which staff can raise concerns in confidence with a nominated person at Director level. Serious concerns are investigated and a summary of any cases is reported to our Audit and Risk Committee.

Code of Conduct

All St Mungo's managers and staff must adhere to our Code of Conduct which clearly sets out expected standards of behaviour. The Code requires staff to act with honesty and integrity, to report misconduct, and to take responsibility for safeguarding as appropriate for their role.

Safeguarding

As part of our work, we identify and support people who have experienced modern day slavery and human trafficking.

All St Mungo's staff are inducted into our safeguarding policies and required to complete mandatory safeguarding e-learning on an annual basis which includes content on modern day slavery. In addition, client-facing staff must attend a safeguarding webinar which also includes content on modern day slavery.

Our Modern Day Slavery Procedure also defines specific responsibilities for staff regarding identification and responding to signs of modern-day slavery. Included within the procedure is a step-by-step process for responding to a client where we have concerns that they may be experiencing modern day slavery. These steps include working with other professionals to create a joint risk management plan, referring clients for immigration advice to support them to understand their rights and entitlements, and supporting the client to access the National Referral Mechanism.

All clients living in our supported accommodation have a safety and wellbeing plan which is reviewed regularly to assess any potential or actual risks to themselves or others. Concerns are captured on our incident forms and, if we believe it is a safeguarding issue, on our safeguarding logs. Concerns are also raised with relevant agencies working with the client, and with local safeguarding teams, the police and specialist agencies for modern day slavery and human trafficking, as appropriate.

There is a dedicated mailbox for staff to ask for advice on safeguarding matters which is responded to by our Safety and Quality Assurance. Staff can also take particularly complex cases to our monthly 'Safeguarding Surgery' for extra support from colleagues with expertise in key areas of safeguarding.

The Chief Executive and Executive Director of Client Services receive a monthly safeguarding report from the Deputy Safeguarding Lead on any serious cases, and we also complete an annual review of all safeguarding cases to identify trends and learning. Our Safeguarding Policy is reviewed annually. The Safety and Quality Assurance team reviews all incidents that are marked as safeguarding.

Partnership working and learning from specialist agencies service lead

We have a Modern Day Slavery lead who is responsible for policy, best practice and supporting service development in this area. At a local level, our managers are involved in various initiatives to identify and take action, and to prevent modern day slavery and human

trafficking. We regularly share and promote good practice guidance from specialist agencies to improve staff expertise, raise awareness and skill up staff.

Tenancy and licence management

We have comprehensive referral processes into all our residential 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 day slavery or human trafficking.

We also routinely screen for vulnerability at various stages of tenancy and licence management and provide additional support where needed. Referral forms are used to explore support needs and vulnerability in prospective tenants/licensees. This is explored further during the booking-in/tenancy sign-up. Additional support is then put in place to help our service users manage their tenancies or licences, reducing the risk of exploitation from others.

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 2025.

Emma Haddad, Chief Executive

St Mungo's Community Housing Association

September 2025

Approved by St Mungo's Board of Trustees September 2025.