



**Modern Slavery and Human  
Trafficking Statement**

**Financial Year: 31 March 2023**

**Issue Date: April 2023**

## Modern Slavery and Human Trafficking Statement

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| <b>Contact Officer:</b>         | Executive Director of Finance                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Policy Version:</b>          | Version 5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <b>Version Approved:</b>        | Board 14 June 2023                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Policy Links:</b>            | <p><b>Internal</b></p> <ul style="list-style-type: none"> <li>Anti-Money Laundering Policy</li> <li>Probity Policy</li> <li>Whistleblowing Policy</li> <li>Code of Conduct</li> <li>Procurement Rules</li> <li>Bribery Policy</li> <li>Anti-Fraud and Corruption Policy</li> <li>Safeguarding</li> </ul> <p><b>External</b></p> <ul style="list-style-type: none"> <li>Modern Slavery Act 2015</li> <li>NHF (National Housing Federation) Code of Governance</li> <li>RSH (Regulator of Social Housing) Regulatory Standards-Governance and Financial Viability Standard</li> </ul> |

### **Brief Policy Summary:**

Organisations with an annual turnover of at least £36m are required to make an annual Statement about their approach to tackling modern slavery in its various forms which may impact on LHP's activities such as procurement and supply chains.

## Contents

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|                                     |          |
|-------------------------------------|----------|
| <b>Introduction</b> .....           | <b>4</b> |
| <b>Organisation Structure</b> ..... | <b>4</b> |
| <b>Compliance</b> .....             | <b>4</b> |
| <b>Our supply chain</b> .....       | <b>5</b> |
| <b>Training and awareness</b> ..... | <b>5</b> |
| <b>Next Steps</b> .....             | <b>6</b> |
| <b>Conclusion</b> .....             | <b>6</b> |

## Introduction

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1. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (MSA) and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2023. It outlines the measures we have taken to ensure compliance with the Act and what actions we plan to take to further expand on combatting modern slavery.
2. Modern slavery is a crime and a violation of human rights. It takes various forms, including slavery, servitude, compulsory labour, and human trafficking for exploitation and can have a significant adverse impact on individuals, families, and communities across the world.

## Organisation Structure

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3. Lincolnshire Housing Partnership (LHP) is a 12,700-home landlord covering the whole of the historic East Coast of Lincolnshire, LHP provide affordable rental and shared ownership homes as well as a range of services to help support people and communities.
4. As a charitable community-based organisation, we channel profit back into services and projects that benefit our customers and local neighbourhoods. Our operating area covers 3 Lincolnshire local authority areas, we house 26,000 people in our 12,700 homes. Our annual turnover is £53 million.

## Compliance

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5. We are opposed to slavery and human trafficking. We will do what we can to combat such abuse in our business and in our supply chains.
6. We have a meticulous recruitment and onboarding process which ensures all employees have the legal right to work in the UK. This work is completed to any employee's contract start date.
7. We will act ethically and with the highest standards of integrity, quality, probity, openness, and accountability in all our business operations and relationships.
8. We will develop, implement, and enforce processes and controls that seek to ensure slavery and human trafficking is not taking place within our business nor in our supply chains, and have during the financial year undertaken a review of our suppliers who are subject to the Modern Slavery Requirements to ensure that where required they have published a Modern Slavery Statement.
9. We will not knowingly deal with any business involved in slavery or human trafficking.
10. We will only use reputable employment agencies and we will always verify the practices of any new agency before engaging with it.

11. Employees are required to avoid any activity that might lead to, or suggest, a breach of this Policy. Employees will be encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our organisation or supply chains at the earliest possible stage utilising our whistle blowing policy.

## **Our supply chain**

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12. Our procurement activities take place in England and our contractors and suppliers are predominantly UK based. We engage with a wide variety of organisations for a broad range of goods and services which are primarily corporate, construction and property related, but also to meet some more specialist requirements.
13. Some of our supplier's subcontract work or rely on recruitment agencies to supply permanent or temporary staff. Whilst we consider that the risk in our supply chains is low, we recognise that no supply chain can be considered entirely risk-free.
14. Our robust tendering process ensures we engage with reputable contractors and suppliers who adhere to all appropriate legislation, regulation, and practices. We evaluate the recruitment techniques of any contractors bidding for work on contracts which represent a high risk of modern slavery.
15. Our contract management arrangements help us ensure they maintain the standards required, including the prevention of slavery and human trafficking.
16. We require that suppliers be compliant with the Act where a contract is renewed during the year, or any new contract has been entered into. To achieve this our procurement process ensures adequate screening is in place throughout.
17. We will continue to ensure that our approved suppliers take appropriate steps to comply with the Act and require new suppliers to declare that they are not involved in slavery or human trafficking.
18. LHP continues to strengthen its procurement processes, and internal guidance is regularly published to colleagues supporting them in their duties in preventing and identifying incidents of modern slavery. This will further support our commitment to the prevention of slavery and human trafficking.

## **Training and awareness**

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19. We raised awareness of modern slavery and human trafficking through the publication of this statement on the LHP website and on our intranet.
20. We may come across slavery and human trafficking in connection with the customers we support. In addition, our homes could be used for modern slavery. We have robust safeguarding procedures in place, and we will deliver training to raise awareness of what slavery and human trafficking might look like in our business; and to encourage key customer facing employees to report concerns.

21. We offer enhanced training for all employees covering What the Modern Slavery Act is, its implications, and how to report concerns.
22. A contract management framework has been introduced, which has been further embedded through training workshops with colleagues.
23. A suite of KPI's has been introduced, reported monthly to the leadership team.

## Next Steps

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24. We continue to map our supply chain in order to assess industry/sector and geographical risk. This work is led by our Procurement Business Partner and covers the entire scope of our business.
25. We will develop our supply chain management, through ensuring the robust contract management processes are fully adopted across the organisation.
26. Continue with periodic checks to ensure our supply chain continues to manage their risk of exposure to modern slavery.
27. Where appropriate, we will include reference to the Modern Slavery Act 2015 in our policies and procedures.

## Conclusion

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28. We have not identified any breaches of the Act during the financial year.
29. We will continue to be vigilant and where a compliance breach is identified, we will act promptly, involve the appropriate lead agencies and feedback lessons learnt in order to minimise the risk of an incident occurring again.
30. We will continue to raise awareness and deliver training to new and existing employees, and we will extend this to our suppliers and contractors, where appropriate.
31. This statement was approved by the Board in June 2023 and will be reviewed on an annual basis.

**Murray Macdonald**  
**Chief Executive Officer**