

Clarion Housing Group Anti-Slavery and Human Trafficking Transparency Statement 2021



CLARION
HOUSING GROUP

Introduction

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery and Human Trafficking Transparency Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. As a business for social purpose Clarion Housing Group does not wish to support or deal with any business knowingly involved in slavery or human trafficking in any part of its operations.

We are committed to treating those who work for us fairly, as an employer we are committed to paying the Living Wage across England and regularly review our terms of employment to ensure they comply with all relevant legislation.

Organisation Structure

Clarion Housing Group is the country's largest providers of social and affordable housing. Our team of over 3,000 staff, supported by our contractors and suppliers, manage 125,000 properties across over 176 local authorities in England.

Clarion Housing Group mixes public and private money to build affordable homes, overwhelmingly for people who can't meet their housing needs in the market. We are a charitable, regulated organisation that deploys responsible, commercial disciplines in the way we conduct our business. It is important to us that we employ ethical business practices that are aligned with our ethos of a business for social purpose.

Our Business

Clarion Housing Group Limited is the parent company of the Clarion Housing Group (Group). Clarion Housing Group Limited has a number of subsidiaries including Clarion Housing Association Limited and Latimer Developments Limited. This Statement covers Clarion Housing Group Limited and all its subsidiaries.



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Our policies and procedures

We have an extensive and robust framework of policies, procedures and contractual requirements in place which should already contribute towards the prevention of slavery or human trafficking within our organisation and our supply chains. These include, but are not limited to; areas such as housing management, risk management, safeguarding, health and safety, recruitment, whistleblowing, procurement, terms and conditions and codes of conduct for staff, suppliers and contractors, as well as stringent and extensive due diligence and checks when recruiting staff or engaging suppliers or contractors.

Due diligence processes for slavery and human trafficking

As part of our initiative to continually identify and mitigate risk, we have in place systems to:

- Identify and assess potential risk areas in our supply chains, by requiring new suppliers to declare that they are not involved in modern slavery or human trafficking and have not been subject to any investigation in connection with any offence involving slavery or human trafficking;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains, by including provisions in our template contract documentation requiring our suppliers to take appropriate steps to ensure that there is no slavery or human trafficking in their supply chains;
- We continue to review our procurement policies regarding tenders and contracts to ensure they reflect best practice and to mitigate against the risk of modern slavery; and
- We have formed links with other housing associations to share information about best practices in tackling modern slavery.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our employees and all our employees within the Group Procurement department have undertaken Ethical Procurement and Supply training which incorporates modern slavery issues.

Our effectiveness in combating slavery and human trafficking

We use the following key performance indicator's (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business supply chains:

Supplier screening: The number and type of issues identified on screening suppliers and sub-contractors.

Whistleblowing: The number of reported breaches in the past year.

This year we will be introducing mandatory annual Modern Slavery Training and will use the additional KPI to measure how effective we have been in tackling Modern Slavery

Training: The number or percentage of staff across the Group trained.

This statement is made under section 54(1) of the Modern Slavery Act 2015. It constitutes our Group's modern slavery and human trafficking statement for the financial year 1st April 2020 to 31 March 2021. The turnover of the Group exceeds £36 million for that period.

This statement is approved by Clarion Housing Group Board on 27th May 2021 and applies to all organisations within the Group.