

# Modern Slavery Act Transparency Statement

## Statement further to the Modern Slavery Act 2015 (section 54(1), Transparency in Supply Chains)

### Newlon Housing Trust and our organisational structure

Newlon Housing Trust is a 'not for profit' Community Benefit Society and a charitable housing association. Newlon owns or manages more than 8,000 affordable homes, across eight boroughs in north and east London. Newlon is the parent company of the Newlon Group, which consists of six organisations: Newlon Housing Trust and its five subsidiaries – Outward, Newlon Fusion, NewlonBuild, Access Homes and NewlonInvest. Although the subsidiaries are not subject to the requirement to publish a statement, the same standards of probity and governance apply across the Group. In 2023/24 Newlon Housing Trust had an annual turnover of £90m, in excess of the £36m required for publishing this statement.

### What is Modern Slavery?

Modern slavery, as defined by the Modern Slavery Act 2015 ("The Act"), includes the criminal offences of slavery, servitude, compulsory labour and human trafficking.

The Act imposes a duty on certain commercial organisations to issue an annual statement, detailing the organisation's commitment to taking steps toward transparency in supply chains. Newlon is obliged to issue a modern slavery statement under the Modern Slavery Act 2015.

As a public sector organisation, we have a duty to report instances of suspected modern slavery. The Trust understands that instances of modern slavery are not always easy to identify. As such, it encourages anyone who thinks there is a possibility of modern slavery, to call the dedicated modern slavery helpline on **0800 121 700** or to report it online at **[www.modernslaveryhelpline.org](http://www.modernslaveryhelpline.org)**.

### Procurement and supply chain

Both our business and procurement activities take place in the United Kingdom, mainly England. We partner with a range of contractors to deliver repairs and property maintenance activities and as well co-operate with other developers and housing associations. We expect and ensure that our partners follow the same values as us. Newlon Housing Trust ensures that there are no acts of human trafficking or modern slavery inside our business or in our supply chain. Newlon's Code of Conduct for contractors sets clear expectations around commitment to diversity and professionalism.

Our procurement policies are reviewed regularly and we benefit from clear employment procedures that ensure that our employees have a right to work in the UK and are paid a fair and legal wage. Staff are expected to behave within our Code of Conduct and to conduct business with the highest ethical standards, including compliance with statutory obligations.

## **Relevant policies and controls**

Newlon's governance arrangements, policies and procedures, and internal controls mean that the risk of modern slavery and human trafficking in its business and supply chain remains low.

Newlon has implemented a number of policies which aim to tackle modern slavery within our business and everyday work. These include:

- Recruitment Policies
- Remuneration and Pay Policy
- Anti-Money Laundering Policy and Procedure
- Group Anti-Fraud and Corruption Policy
- Domestic Violence Policies and Procedures
- Safeguarding Policy
- Standing Orders and Terms of Reference
- Procurement Procedures
- Standard Terms and Conditions
- Code of Conduct for Contractors
- Staff Code of Conduct
- Whistle-blowing/Public Disclosure and Safeguarding Policies and Procedures
- Diversity Policy and Statement

## **Checks, controls and committees**

Newlon has a number of working committees to ensure best working practice. These include:

- Group Audit and Risk Committee
- Development Committee
- People and Governance Committee
- Resident Scrutiny Panel
- Right to Rent checks
- Robust recruitment process to verify identity and check new employees' right to work in the UK
- Internal Control Statements
- Risk Assessments

## Training

Newlon's employees undertake mandatory training as part of their induction which are relevant to mitigating the risks around Modern Slavery, such as on equality and diversity, unconscious bias and procurement policies.

## Standard Selection Questionnaire (SSQ)

Newlon Housing Trust will be adopting the new Standard Selection Questionnaire that now incorporates more robust questions around Modern Slavery. It allows for discretionary exclusion for breach of labour laws, and, where a potential supplier is covered by the Modern Slavery Act - it must be meeting its obligations in publishing a statement and requirements under Section 54 of the Act. All potential suppliers tendering for works with us must state and demonstrate their compliance with the reporting requirements set out in Section 54 of the Modern Slavery Act 2015, relating to transparency in supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Newlon Housing Trust's Modern Slavery Act Transparency Statement for the financial year ending 31st March 2024.

Newlon will review actions taken and controls to mitigate the risk of Modern Slavery and this statement for suitability at least annually or whenever there is a change in legislation, which is monitored through reporting to the Board. This statement will be communicated to all Newlon staff, published on Newlon's website and on the Modern Slavery Statement Registry.



Mike Hinch  
**Group Chief Executive**