

## **St Leger Homes of Doncaster Limited : Modern Slavery statement 2022/23**

### **Introduction**

This statement sets out St Leger Homes of Doncaster Limited's (St Leger) activities to ensure there is no slavery or human trafficking in our operations. This statement relates to the financial year 1 April 2022 to 31 March 2023.

### **Company statement**

Modern slavery has no place in St Leger's business or supply chains and we take a zero tolerance approach to it. Our commitment to all aspects of equality and diversity is inherent in our mission, vision, values and strategic objectives.

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within our operations.

We are also committed to ensuring there is transparency in St Leger and in our approach to tackling modern slavery throughout our supply chains, and we demand the same high standards from all of our contractors, suppliers and business partners.

### **Company structure, activities and supply chains**

St Leger is an Arm's Length Management Organisation (ALMO) managing City of Doncaster Council's (DC) homes and other assets and the homelessness service. We provide affordable, rented accommodation efficiently and provide our customers with the highest standards of service.

St Leger employs over 800 people in a wide range of service areas including housing management and support, property repairs, improvements and technical services, HR, Finance, and ICT.

Expenditure totals nearly £60m to deliver St Leger's day to day housing management and property repairs services, and, on behalf of DC in delivering their capital programme, home and estate improvements.

### **Risk areas**

St Leger operates a wide number of activities in delivering housing management and property maintenance services. These services require a large number of employees and contractors, and some of the products and services we procure may be considered as a higher risk in terms of modern slavery. Therefore, there are a number of risk areas to consider. The main areas identified as where the greatest risks exist are in procurement and our vulnerable tenants.

St Leger operate a risk management framework to mitigate all strategic and operational risks and the policies and procedures, the due diligence and the training, all referred to below, mitigates these risks.

### **Company policies and procedures**

We have an extensive framework of policies and procedures that are reviewed and updated periodically and monitored to ensure best practice is adopted.

Notable strategies, policies and procedures, among others, that consider our approach to preventing slavery and human trafficking in our operations include:

- Whistleblowing;
- Employee Code of Conduct;
- Customer care;
- Vulnerable persons;
- Housing Management Strategy and Policy;
- Procurement Strategy;
- Financial Regulations;
- Contract Standing Orders;
- Recruitment and Selection;
- Anti-Fraud, Corruption and Bribery;
- People Strategy;
- Dignity at work;
- Equality, Diversity and Inclusion Strategy; and
- Homelessness code of guidance for local authorities

Further information can be found on [www.stlegerhomes.co.uk](http://www.stlegerhomes.co.uk)

More specifically, the Housing Management policy includes specific guidance for staff on how to recognise safeguarding issues, such as modern slavery, as a type or pattern of behaviour which constitutes abuse of any person at risk, and also how to respond to and escalate any concerns.

### **Due diligence**

St Leger undertakes extensive due diligence on tenants, employees, and suppliers as part of everyday operations.

### Tenants

Robust tenancy verification checks are in place for sign ups, plus further verification visits on some estates. Our Tenancy Agreement includes reference to the Modern Slavery Act.

We undertake a number of operational activities where possible signs could be viewed. These include:

- programmed tenancy audits of our properties;
- financial inclusion / welfare reform support delivered by a dedicated tenancy support team;
- neighbourhood management, local offices and patch workers resulting in our officers knowing a large number of tenants;
- strong working relationships with the Tenant and Resident Associations (TARAs);
- a St Leger fraud hotline;
- Community Caretaker Services reporting any illegal or unusual practices;
- tenancy sign up procedures covers the clauses in the updated Tenancy Agreement
- periodic estate inspections where we might notice anything indicating modern slavery, and residents can attend and often report issues;
- tenancy verification visits on some estates;
- Direct links between our in-house services team and estates teams to report any concerns.

### Supply chain

Annually, St Leger uses over 500 suppliers, and around half of these on a regular basis. A number of these will not be subject to the provisions of the Act but we believe the Act's ethos and requirements are valid irrespective of the size of our suppliers.

To ensure compliance with our values and ethics, we have in place rigorous selection processes which include checks on financial standing, convictions, and health and safety, to help ensure our suppliers and their supply chains are slavery free.

All suppliers, as part of our tender procedures, must complete a self-assessment Standard Selection Questionnaire (SSQ). In Section 2 'Grounds for mandatory exclusion', 2.1(a) suppliers must declare the following:

Must declare if in the past five years if organisation or representative with authority has been convicted anywhere in the world in relation to

- Participation in a criminal organisation;
- Corruption;
- Fraud;
- Terrorism;
- Money Laundering or terrorist financing; and
- Child labour or other forms of human trafficking.

SLHD can exclude suppliers that tick yes to declare they have been prosecuted for child labour or other forms of trafficking human beings. Offences under:

- Section 4 of the Asylum and Immigration Act 2004;
- Section 59A of the sexual Offences Act 2003;
- Section 71 of the Coroners and justice Act 2006;
- Sections 49, 50 and 51 of the Drug Trafficking Act 1994; and
- Section 2 or Section 4 of the Modern Slavery Act 2015.

In Section 7 of the SSQ, assurance is given that if the supplier is subject to Section 54 of the Modern Slavery Act 2015, that they have complied with their obligations. In 2023/24 the new Cabinet Office Standard Selection Questionnaire will replace the previously used one. This has increased reference to Modern Slavery and the grounds that can be used to exclude suppliers.

St Leger is in contact with all suppliers, stating our commitment to modern slavery, assessing their own arrangements, and amending contracts as and when they become due for renewal.

In 2023/24 St Leger will be implementing a Supplier Code of Conduct and this will refer to Modern Slavery and expectations of suppliers and their subsequent supply chains.

Our Financial Regulations, Contract Standing Orders and Procurement Strategy ensure we operate in a legal, ethical and inclusive manner whilst achieving best value for money. St Leger's procurement services are delivered by a dedicated Procurement team within the City of Doncaster Council under a Service Level Agreement and utilises Public Procurement compliant frameworks operated by procurement consortia. St Leger has representatives on the boards or working groups of a number of consortia, which enables robust benchmarking and sharing of best practice.

All contracts have specific Terms and Conditions linked to modern slavery sections contained within them.

St Leger recognises our social responsibility. Contracts also include 'back to back' clauses whereby contractors use the same terms and conditions if any work is subcontracted down the supply chain.

Through effective contract management St Leger check explicit slavery issues when we review other areas such as price increases, performance and E&D commitments, as part of our established contract management arrangements.

If any of this work identifies risks of modern slavery, this could result in termination of the supplier's contract. Concerns will be reported to the National Crime Agency's helpline as appropriate.

All relevant Procurement staff have undertaken the Chartered Institute of Procurement and Supply's (CIPS) online course titled 'Ethical Procurement and Supply'.

### Employees

Our Recruitment and Selection Policy contains relevant requirements in terms of checking of eligibility (Right to Work checks that meet Home Office guidance) to work in the UK and carrying out of necessary checks such as Disclosure and Barring Service (DBS) on relevant employees. References are requested on all employees.

St Leger has a contract in place for the provision of temporary agency workers. The provider has been procured in accordance with all supplier contract award requirements.

### **Key performance indicators (KPIs)**

St Leger operates an extensive Performance Management framework, with a balance scorecard of KPIs and additional Management Indicators (MIs) that form part of our overall governance arrangements.

Our KPIs and MIs are reviewed annually and comprise measures relating to tenants and residents of the borough, including homelessness, our employees and the assets under our management. Underneath all of these are operational processes to ensure borough residents receive the highest levels of service and support in safe, secure accommodation from trained staff and contractors.

### **Training**

St Leger has structured induction and training programmes which are updated periodically.

Modern slavery was referenced in all appropriate training during the year. Training delivered that referenced modern slavery included:

- corporate induction and local induction processes, which include a buddying system where appropriate;
- all employees receiving an Employee Code of Conduct which they must sign to confirm receipt,
- all employees are required as a minimum to undertake a safeguarding e learning session with a refresher every three years; this include a reference to modern slavery
- guidance is published in our employee newsletter and posted on our intranet periodically;
- recruitment and selection training is provided to managers and includes right to work checks and the importance of pre-employment checks;
- Equality and diversity e-learning, is a minimum requirement for all employees with a requirement for a refresher period every two years;
- Fraud Awareness and Anti-Fraud and Corruption Awareness training is provided to the management population and relevant roles; and
- All colleagues are required to complete a GDPR e learning with requirement for a refresher every two years.

The St Leger intranet is updated with developments in Modern Slavery and has links to the main government website ([www.gov.uk](http://www.gov.uk)) for employees to be able to access training resources, videos, leaflets and other related information.

Completion of all mandatory training is monitored through the online learning management system.

### **Signing**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and is St Leger's slavery and human trafficking statement for the financial year ending 31 March 2023.

Signed by:

A handwritten signature in black ink that reads "Dave Richmond". The signature is written in a cursive style with a large, rounded initial 'D'.

Dave Richmond  
Chief Executive  
St Leger Homes of Doncaster Limited  
1 June 2023