

# St Leger Homes of Doncaster Limited: Modern Slavery statement 2023/24

## 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 2023 to 31 March 2024.

## 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 (CDC) homes and other assets. We provide homes in neighbourhoods where [people are proud to live 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 around £80m to deliver St Leger's day to day housing management and property repairs services, and, on behalf of CDC 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
- Housing Management Policy
- Domestic Abuse (staff and tenants)
- Procurement Strategy
- Risk Management framework
- Financial Regulations
- Contract Standing Orders
- Recruitment and Selection
- Anti-Fraud, Corruption and Bribery
- People Strategy and Health and Wellbeing Policy
- Dignity at work
- Equality Strategy
- Fairness and equality statement 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 our tenants via a number of different groups such as (Tenant Scrutiny Panel, One Voice Forum, Tenants and Residents Associations and other involved groups)
- guidance on spotting and reporting fraud
- Community Caretaker Services reporting any illegal or unusual practices;
- tenancy sign up procedures covers the clauses in the updated Tenancy Agreement
- periodic estate walks / 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
- Properties sold under Right to Buy legislation.

### **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 if, in the past five years if the 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.

St Leger 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 replaced 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.

St Leger has implemented 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 and governance groups, 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 and where possible target contracts that are considered high risk. 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, and this includes asking referees for any concerns about the applicant working with vulnerable people or children.

St Leger has a contract in place with a temporary staff provider to ensure core services are maintained if employee posts become vacant. 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 a structured induction and training programmes which are updated periodically.

Modern slavery was increasingly referenced in all appropriate training during the year.

Training delivered that referenced modern slavery included:

- all new employees undergo a corporate induction, receiving an Employee Code of Conduct which they must sign to confirm receipt, and have a safeguarding session;
- guidance is published in our employee newsletter and posted on our intranet;
- safeguarding training is delivered to all new starters and refreshed every three years and this now includes specific elements on modern slavery.
- corporate induction and local induction processes, which include a buddying system where appropriate;
- 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, including modern slavery. All employees are required to complete this mandatory training;
- fraud, money laundering and Data Protection.

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.

For apprentices, the Employee Code of Conduct is emphasised and the roles of trade unions and first contact officers should they ever see or feel anything that makes them uncomfortable or that something is not right.

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

In addition to the above, a briefing providing background information and advice for staff on what to do if they suspect that slavery, human trafficking, etc. takes place, and also providing guidance on the selection of suppliers, is and will continue to be published in our employee newsletters and posted on our intranet.

## 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 2024.

Signed by:

A handwritten signature in black ink that reads "C Margrave". The signature is written in a cursive style with a period at the end.

Chris Margrave  
Chief Executive  
St Leger Homes of Doncaster Limited  
June 2024