

Statement on Modern Slavery



L&Q is one of the UK's leading housing associations and one of London's largest residential developers. We own or manage approximately 90,000 homes in London and the South East.

We are an exempt charity committed to a wider social responsibility. This commitment has been integrated throughout the work of the organisation.

We are committed to ensuring that we comply with our legal and regulatory responsibilities, including the Modern Slavery Act 2015. We continue to take care to ensure that slavery and human trafficking does not exist in any part of L&Q's business or supply chain.

As a landlord we are working on identifying how modern slavery and human trafficking may affect our customers. We will come across a wide range of customers which reflect a diverse variety of backgrounds and needs. We recognise that isolated residents and people with learning difficulties may be particularly vulnerable or at risk.

Our safeguarding of adults at risk policy (Safeguarding) highlights modern slavery and all staff underwent baseline safeguarding training to build awareness and understanding of our vulnerable customers, how to identify potential risk factors and at risk groups, including signs of exploitation and respond to them. The extent of safeguarding training staff underwent varied depending on their role, but all customer facing staff attended formal classroom training whilst managers working with vulnerable customers attended a compulsory intensive two day safeguarding course. We have a dedicated safeguarding team in place that is available to offer advice and guidance to members of staff across the Group and we hold quarterly cross departmental safeguarding committee meetings.

We continued, through our unauthorised subletting, tenancy fraud and tenancy management policies and procedures, to work to ensure that we understand who is living in the properties we manage.

As an employer we are committed to paying our staff the relevant wage set out by the Living Wage Foundation; or the National Living Wage for apprentices.

We manage projects and procurements where services and products are sourced from suppliers. Most of these products are not sourced by us directly but are sourced by our contracted suppliers of services, goods and works. As an organisation that does not wish to work knowingly with any business involved in slavery or human trafficking in any part of its operations, we have taken the following steps:

- We require new suppliers to declare that they are not involved in slavery or human trafficking and have not been subject to any investigation in connection with any offence involving slavery or human trafficking
- Our template contract and sub-contract documentation include provisions requiring our suppliers to take appropriate steps to ensure that there is no slavery or human trafficking in their supply chains
- Our tender documentation notifies potential suppliers that we will expect them to comply with the Modern Slavery Act

- We have published a Code of Conduct for L&Q Suppliers on the L&Q website. This includes the requirement that all suppliers comply with the Modern Slavery Act
- We pay particular attention to those procured goods/services carrying the highest risk of modern slavery within their supply chain
- We have a whistleblowing policy for all staff.

We will assess any evidence of non-compliance and will take appropriate remedial action. We will only trade with those who comply with this statement and the terms of our contracts or those who are taking verifiable steps towards compliance.

Plans for 2020/21

During the coming year L&Q will consult on the development of a new procurement strategy. Part of this exercise will assess the feasibility of moving L&Q to a broader supply chain approach over time. A by-product of which would be to provide greater visibility and assurance of labour practices including identification of activity that could constitute modern slavery beyond our first-tier supply chains.

In addition, L&Q will introduce on-line training resources to heighten understanding amongst our procurement, commercial and construction functions to ensure that colleagues at all levels who need to understand modern slavery risk have access to relevant information. We are also in the process of transforming all our formerly classroom-based training, including safeguarding training, online.

Trafford Housing Trust (THT), joined the L&Q Group in October 2019. An element of the alignment roadmap between the two organisations will be THT's adoption of L&Q's Safeguarding Policy, which, as noted above, addresses the risk of modern slavery. In addition, work will commence to align THT's overall approach to modern slavery and human trafficking with L&Q's activities.

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

This statement will be reviewed and updated on an annual basis and is approved by L&Q's Group Board. It applies to all companies and organisations within the Group with the exception of:

- The L&Q Estates portfolio (formerly known as the Gallagher Estates portfolio), the L&Q Group's strategic land business, which has a separate statement that reflects the distinct nature of its activities, but is consistent with the Group policy
- THT, which has a separate statement.

The L&Q logo is displayed in a bold, black, sans-serif font on a bright yellow rectangular background.