



Homes
England

**Homes England
Modern Slavery Act**

Statement 2024/2025

PUBLISHED DOCUMENT VERSION CONTROL

Version	Date	Author	Comments
1	March 2016	HCA Modern Slavery Statement	Original Version produced by Homes and Communities agency
2	March 2017	HCA Modern Slavery Statement	Second annual MSA Policy and Statement produced by Homes and Communities agency
3	June 2018	Homes England (Risk)	Third annual MSA Policy and Statement (first produced by Homes England Operational risk)
4	April 2019	Homes England Financial Crime Compliance	Fourth annual MSA Policy and statement produced by Homes England Financial Crime compliance as FCC has taken over responsibility for the policy from Operational risk.
5	March 2020	Homes England Financial Crime Compliance	Fifth annual MSA Policy and statement produced by Homes England Financial Crime compliance
6	July 2021	Homes England Financial Crime Compliance	Sixth annual MSA Policy and statement produced by Homes England Financial Crime compliance
7	April 2022	Homes England Financial Crime Compliance	Seventh annual review of MSA Policy and statement produced by Homes England Financial Crime compliance
8	September 2023	Homes England Anti-Economic Crime (AEC)	Eighth annual review of MSA statement produced by Homes England Anti Economic Crime team (Policy reviewed separately April 2023)
9	September 2024	Homes England Anti-Economic Crime (AEC)	Ninth annual review of MSA statement produced by Homes England Anti Economic Crime team

Modern Slavery Act 2015

Homes England's Statement 2024/25

Introduction and role

This statement sets out the steps that Homes England has taken to provide assurance that slavery and human trafficking are not taking place within its supply chains and its own business.

As the government's housing and regeneration agency, we believe that affordable, quality homes in well-designed places are key to improving people's lives. Together with our partners, we are accelerating the pace of house building and regeneration across the country, as we seek to deliver homes and places people are proud to live in – for generations to come.

Our Investment and Development models support housing and economic growth using delivery partners, including registered providers of social housing, house builders and developers in both the public and private sector; and direct intervention by providing loans to builders and developers, including small and medium-sized enterprises (**SMEs**).

Homes England occasionally undertakes activities by partnering with local authorities and developers within a special purpose entity or joint venture partnership organisation and often, where appropriate, we will undertake direct development using delivery partners or construction companies procured for that purpose.

Internal policies

Homes England aims to provide a rewarding working environment in which people are valued and respected. We have a strong commitment to diversity, equity and inclusion and look after the wellbeing of our people, ensuring that they are safe and cared for appropriately.

Good corporate citizenship and corporate responsibility are important parts of our identity, as a public body, and employer. We set out the ethical standards we expect of our colleagues to demonstrate, outlined in various policies, including our Declarations of Interest Policy published on our digital platform, Net Consent. Our policies and procedures aim to ensure that we create a safe and inclusive working environment for our colleagues. Our Net-Consent content contains policies and procedures including:

- Whistleblowing Policy.
- Dignity and Respect at Work Policy; and
- Diversity, Equality, and Inclusion Strategy

Supply Chain

Homes England maintain several professional services and development framework agreements, with our framework partners and these are made available to the wider public sector. We also maintain many other frameworks for exclusive use including site security and legal services. The scope of our procurement activities is summarised at Appendix A.

Assessing our Risk Exposure

Our earlier Statements concentrated on the risk associated with third party procurement activities, including land sales to large house builders or developers. As each large company is required to comply with the Modern Slavery Act (the **Act**) Homes England has historically placed significant reliance on their own supply chain risk assessments and activity monitoring.

Over the past 7 years, Homes England's business activities have significantly expanded, along with our understanding of modern slavery risk across the construction sector. Our assessments have determined that:

- Our primary risk is through a delivery partner, framework participant or investment recipient, regardless of size, with an ambiguous or non-compliant supply chain; and

- Where we provide loans to SMEs, our assessment has identified a specific risk in certain foreign supply chains, as noted below.

Our analysis has reconfirmed that our primary risk is an association with a delivery partner, framework participant or company with an ambiguous or non-compliant supply chain. Continued assessment of our risk environment indicates that our primary risks remain constant and our controls to mitigate against these risks whilst mature and should be agile to respond and always evolving.

Evaluation of information provided by His Majesty's Government (**HMG**), Non-Governmental Organisations (**NGOs**), Gangmasters and Labour Abuse Authority (**GLAA**) and law enforcement agencies, together with open-source material, continues to allow us to further focus our response to modern slavery - by concentrating resources on our sites in those geographical hot spots where it is considered most prevalent.

Management

Homes England's approach has been to widen our risk assessment across business lines, benchmarking our activities and policy statement with other organisations with similar supply / reputation risk issues and engage with leading anti-slavery organisations.

Homes England has conducted a review of its Modern Slavery Policy (published April 2023) and current statement against our activities. Our intention is to establish whether our approach follows emerging best practice, by assessing and interpreting recent and/or emerging case law and best practice, including a review of the Transparency in Supply Chains provision in the Act, and Cabinet Office procurement directives.

Our approach ensures we have a clearer understanding of the supply chain risks across our business lines:

- Established that SME participants are at a higher risk in certain component supply chains. To support investment decisions, applicants are required to provide a Project Delivery Plan, which enables us to discuss and clarify supply chain anomalies.
- Re-affirmed compliance requirements with the Act in our tender and procurement documentation.
- Reviewed existing compliance conditions in existing contracts and agreements, including termination clauses.
- Identified how we can continue to use our framework panel of compliance and monitoring surveyors to provide escalation and notification of suspicious activity or welfare concerns.
- Engaged with multi-industry leads on modern slavery and will continue this engagement to keep up to date with current trends, evolving risks and to share best practice.

We will:

- Continue to be vigilant when assessing areas of potential risk within our supply chain, and that our delivery partners, framework participants, investment and grant recipients act with comparable zeal.
- Increase awareness with third parties we engage with, by promoting and signposting industry led on-line guidance and compliance tool kits to them - as supplied by the Chartered Institute of Building (**CIOB**) the Royal Institute of Chartered Surveyors (**RICS**) and others.
- Continue to provide training and raise awareness - both internally and externally - and help in the identification of new areas of risk arising from our wider business activities.
- Increase our understanding of risk within the sector; and, specifically, SME and equity participation risk. To succeed, we will examine all available information provided by law enforcement agencies and NGO partners; and
- Work collaboratively with other organisations across the sector, to identify additional methods to promote and support the government's aim to eradicate the injustice and brutality of modern slavery and human trafficking.

Ongoing monitoring will enable us to identify our sites and SMEs that are of a higher risk of modern slavery and to tailor our activities and support those risk hotspots. Homes England's contractual arrangements, require monitoring surveyors and portfolio managers to function as the Agency's 'eyes and ears' when checking development progress; and the Anti Economic Crime team (AEC) provides guidance and clarity on how to report suspicious activity or welfare concerns.

Environment & Mitigation.

The potential risk of Modern Slavery arises from the following key scenarios:

- The risk that we procure goods or services for our own consumption where there is an unethical supply chain.
- The risk that we partner alongside organisations with an unethical supply chain, or we engage, invest, lend, or sell land to organisations with an unethical supply chain.

We mitigate these risks by:

- Using monitored framework panels/suppliers demonstrating compliance with the requirements of the Act.
- Up-front compliance requirement in our tender and procurement documentation, enforced at delivery by contractual conditions and agreements; and including appropriate termination clauses. This is supported by pre-procurement dialogue and monitoring throughout the duration of the contract.
- Customer due diligence research to identify organisations and individuals with criminal convictions or a higher potential risk of non-compliance.
- Requiring applicants to provide details of their development scheme; this provides us with an opportunity to identify potential supply chain risks within the development specifications.
- Introducing, and continually assessing procurement processes and procedures and supplier due diligence - including Homes England's contractual arrangements, with the inclusion of a mandatory undertaking from our contractors that they will comply with the provisions of the Act.
- Confirmation of the applicability and enforceability of clauses and conditions included in our legal agreements and contracts.
- Requesting management information from our panel firms in relation to the training they provide both internally, to their staff, and externally, to their contractors. This information has provided Homes England with assurance that we are able to measure the compliance of our contractors against our procurement controls.

For those companies with whom we engage but who do not produce an annual modern slavery statement, due to their turnover being below £36 million, we request that they produce a statement detailing that they have considered their obligations regarding the suitability of their workforce and supply chains, and the risk of Modern Slavery and exploitation in their supply chains. This is consistent with the recommendations contained in the independent review of the Act .

We recognise that Modern Slavery is a crime and a violation of fundamental human rights. We are aware that Modern Slavery takes various forms, including slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Homes England continues to adopt a zero tolerance to modern slavery, human trafficking, all forms of servitude and forced and compulsory labour. Modern Slavery is the term used within the UK and is defined within the Act. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking (the latter of which comes from the United Nations's Palermo Protocol).

Homes England fully supports the government's objectives to eradicate all forms of modern slavery and human trafficking, and we will continue to set high standards of impartiality, integrity, transparency, and objectivity. We will ensure that our activities and those of our contractors operate

to the highest

ethical standards, operating under sound governance arrangements. Our annual statement provides details of our activities, supply chains and actions we continue to take to support government in its aim to eliminate modern slavery.

We require all organisations we engage with to ensure their goods, materials, and labour- related supply chains:

- Fully comply with the Act; and
- Are clear, transparent, accountable, and auditable.

We call upon all organisations we engage with to influence their global supply chains by improving transparency, accountability, and training, so that together, we can help the government and our society to eradicate the injustice and brutality of modern slavery and human trafficking.



Peter Freeman
Chair
October 2024



Peter Denton
Chief Executive Officer
October 2024

Appendix A – Scope of our Procurement activities

Homes England procurement activities take place in England; and our contractors and suppliers are predominantly UK and EU based.

We typically host between 40 and 60 competitive procurements annually with an award value in excess of £10,000 each; our total annual procurement spends for 2023/24 was £216 million.

We place general reliance upon the Crown Commercial Service (**CCS**) and government procured supply chains for our consumable goods and operationally focused services (IT, energy, fleet cars and temporary staff). In 2023/24 spend via CSS frameworks exceeded £40m, due largely to Digital and Professional Services.

In our own right, we maintain a number of professional services and development Framework Agreements, which are made available to the wider public sector. We also maintain several other frameworks for exclusive use, including site security and legal services.

Our Frameworks enable users to draw-down professional multi-disciplinary services and development expertise. This includes the services of development or construction companies, with their associated goods, materials, and labour-related supply chains. We currently have four professional services frameworks available to the wider public sector. These have a cumulative value of £410m (Property £100m, Development and Regeneration Technical £200M, Development monitoring £40M and Research and Economics £70m). We also maintain several frameworks for our own use, including Legal Services (£50m).

We also maintain a flexible Dynamic Purchasing System (**DPS**). The Delivery Partner DPS is similar to a Framework but remains open for housebuilders and developers to join as sites become available. This more flexible approach will help diversify the housing market and enable us to work with a wider range of housebuilders large and small.

In addition to the above-mentioned CCS and Framework purchasing, we procure around £57m worth of services, supplies and works directly from SMEs, predominantly based in the UK or the EU.

We do not maintain goods, materials, or direct-labour supply chain Frameworks.

An organisation's Modern Slavery Statements is referred to in our invitation to tender and legal agreements. We have modified our procurement processes to highlight guidance and information relevant to organisations we engage with, and a wider public audience. We will continue to build upon this guidance. This includes links to the CIOB construction industry toolkit and the United Nations / RICS 'Advancing Responsible Business Practices in Land, Construction and Real Estate Use and Investment' and a victim support link together with information relating to the GLAA.

In common with many organisations, our employees occasionally stay in UK hotels when conducting business away from the office. Accommodation and travel arrangements are organised through a government procured travel agent with a publicly stated risk-assessed supply chain procedure. We occasionally procure meeting and conference venues to support our general business activities, and these are selected through the CCS framework to ensure good value for money. We note that the hotel and hospitality trade recognise the risk of modern slavery within their sector and a Stop Slavery Hotel Industry Network is being developed by the industry.

Procurement and Tender Process Improvements

Existing tender documentation includes the mandatory exclusion of any bidder who has been convicted of an offence under the Modern Slavery Act 2015.

To comply with government procurement regulations, we have introduced a new electronic tendering (**e-tendering**) system. The initial phase of e-tendering continues to use the existing tender documentation and templates as attachments. However, we are exploring methods to embed key compliance questions into the software application to make use of the inbuilt evaluation functionality. Standard tender documentation has been updated during the current financial year for the following – updated guidance from CCS and changes to the PAS91 questionnaire which forms part of our standard suitability assessment for construction processes. We have continued to incorporate improvements to our equality and diversity questions during 2023/2024.



We have adopted the Cabinet Office's standard Selection Questionnaire (**SQ**) across all our procurement activities, which includes compliance and exclusion requirements across a broad range of matters including Modern Slavery.

Following the UK's departure from the EU there have been changes to the mechanics of the procurement process with opportunities advertised via the Find a Tender website rather than via the previous EU infrastructure. The substance of the requirements has not changed and the requirements relating to modern slavery have not been affected. New legislation on procurement, the Procurement Act 2023, will be implemented from 24 February 2025. This new act includes specific reference to our ability to exclude suppliers from procurements for labour market, slavery, and human trafficking offences, including those under the Act.

Due Diligence Improvements

As part of Homes England's Know Your Customer (**KYC**) due diligence process, the Agency subscribes to World-Check – this database provides wide-ranging information on organisations, including details of financial crime, bribery, corruption, human rights crimes, and environmental crime convictions. Homes England uses World-Check information to help inform its decision-making process, and when on boarding new customers in a wide range of its business activities. Homes England's central procurement team have sought improve its existing on-boarding capabilities with the addition of further detective and prevention tools that have enhanced existing processes.

Homes England procurement activities take place in England; our contractors and suppliers are predominantly UK and EU based.