

Modern Slavery Statement

As a responsible employer and business, and as an organisation dedicated to improving the lives of our residents and the communities we serve, Peabody is committed to doing everything we can to prevent slavery and human trafficking. This statement sets out how we deliver that commitment, understanding and mitigating the risks of slavery or human trafficking taking place within our business or supply chain, and demonstrating compliance with the Modern Slavery Act 2015 (“the Act”).

Our business

Peabody was established in 1862 by the American banker and philanthropist, George Peabody. We are one of the oldest and largest housing associations in London with a presence in the majority of London boroughs. Following the merger with Family Mosaic in 2017, we provide services to over 111,000 residents and 8,000 care home services customers across London and the South East. As well as bricks and mortar, we provide community programmes and care and support services for the benefit of our residents, customers and for people living in the surrounding neighbourhoods, including employment and training support; health and wellbeing projects; family support programmes; welfare benefits advice; and activities for younger and older people. This work aims to tackle poverty at its roots, and support the most vulnerable people in our communities, supporting people to transform their lives and communities for the better.

Peabody Group

This statement has been prepared to cover the activities of Peabody Trust and the following organisations: Peabody South East Limited; Peabody Developments Limited; Peabody (Services) Limited; Peabody Construction Limited; as well as all other subsidiaries of Peabody Trust, as set out on Peabody’s website.

Robust strategies, policies and procedures

The Group has strategies, policies and procedures in place which help detect and prevent slavery and human trafficking. These cover our workforce, our supply chain and our residents as well as the wider communities we work with across London. They include:

- paying the Living Wage as a minimum to all employees
- requirements for all new employees to provide original documents (such as a passport) before their start date to verify their legal right to work in the UK
- induction training for all new employees on equality and diversity; and on the work of the Group’s Community Safety and Support Team, which seeks to recognise and work with vulnerable people and safeguard children and vulnerable people in our communities
- strategies and policies on equality and diversity, vulnerability, safeguarding, domestic abuse and violence against women and girls
- specialist training for front-line employees in safeguarding, domestic abuse and violence against women and girls

- the requirement that all employees adhere to Peabody's Code of Conduct which includes provisions against bribery, and requirements in relation to workplace behaviour and equality and diversity
- a whistleblowing policy which protects employees and contractors from negative repercussions if they make a report in good faith about an apparent breach of legislation or Peabody's Code of Conduct, and requires that all such reports will be properly investigated and acted upon, as necessary.

An engaged workforce

Peabody regularly reviews its policies and practices to make sure they are compliant with legislation and in line with organisational needs and best practice. The Peabody Code of Conduct applies to all board and committee members, employees, involved residents, contractors, consultants and agency staff. It is designed to assist employees and others working with Peabody to understand their responsibilities and obligations and provide guidance on expected behavior in the workplace. As a housing association and organisation active in community work across London and the South East, Peabody is well placed to identify signs of slavery and human trafficking, and as such we place value on the training our front-line employees receive to help them spot issues when going into homes and meeting residents and customers.

Our supply chain

Peabody has circa 8000 suppliers. In relation to new suppliers, for any tenders for contracts above the OJEU threshold, compliance with the Act has been included within the selection process. Any failure to meet this will lead to disqualification of the applicant. For contracts or agreements below the OJEU thresholds, clauses are included within the Group's standard terms and conditions seeking assurance from suppliers that they comply. In addition, requests for quotations include a compliance check with the Act. Last financial year we added all our active suppliers to an online platform which tracks all legal events and judgements placed against firms. We monitor updates to these companies to see any changes in risk levels which may indicate non-compliance with the Act. In addition, we are undergoing the process of becoming a London Living Wage ("LLW") accredited employer. Each of our future contracts (in scope of the LLW) will have this provision added into the contract.

Signed:



Lord Bob Kerslake,

Chair of the Board

Approved by the Board of Peabody Trust on behalf of the Peabody Group on 15 May 2019