



Flagship Group  
31 King Street,  
Norwich,  
Norfolk,  
NR1 1PD  
0808 168 4555  
[info@flagship-group.co.uk](mailto:info@flagship-group.co.uk)  
[flagship-group.co.uk](http://flagship-group.co.uk)

# Modern Slavery Statement

## Introduction from the Director Legal and Governance (Company Secretary)

We are committed to improving our practices to combat slavery and human trafficking. This includes engaging with suppliers and contractors who share our view on modern slavery and human trafficking and making this a term of our standard terms and conditions.

## Organisation's Structure

We are a registered provider of social housing. We are the parent company of Flagship Housing Developments Limited, Hopstead, Flagship Finance Plc, Gasway Services Limited and Blue Flame (Colchester) Limited. The Group has 1527 employees and operates in East Anglia. The Group has an annual turnover of £253 million.

## Our Business

Our business is organised into six business units:

- Newtide Homes, Samphire Homes and Victory Homes which provide residential accommodation to both the social housing sector and private rented accommodation
- Hopstead which is a charitable organisation, set up to assist with the prevention of homelessness (incorporated 9<sup>th</sup> July 2020)
- Flagship Services which delivers the Group's in-house repairs and maintenance service and also carries out cleaning and grounds maintenance
- Flagship Housing Developments Limited which develops land for residential housing both in terms of rented accommodation and build for sale
- Gasway Services Limited ("Gasway") and our non-trading subsidiary company Blue Flame (Colchester) Limited which are gas servicing, repairs and installations companies operating in East Anglia and London.
- Flagship Finance Plc (a wholly owned subsidiary incorporated on 10<sup>th</sup> June 2021) which is a funding vehicle, set up with the sole purpose of securing funding for on-lending to Flagship Housing Group Limited.

## Our Supply Chains

The majority of our supply chain consists of suppliers of repairs and maintenance components, construction works, information technology and software, repair and maintenance contractors and suppliers of professional services.

## Our Policies on Slavery and Human Trafficking

We are committed to making all reasonable efforts to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery and Human

Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships.

## **Due Diligence Processes for Slavery and Human Trafficking**

As part of our initiative to identify and mitigate risk we monitor potential risk in our supply chains and protect whistle blowers. All staff, contract managers and the procurement team receive training on this subject and we monitor for any indicators of modern slavery. The general risk is considered very low given the nature of our supply chain, in terms of utilising local, well known companies, many of whom we have long-term relationships with. Our procurement exercises also outline our standards and expectations, for example supplier code of conduct and our tender questionnaire includes questions about modern slavery.

## **Supplier Adherence to our Values**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have included a prohibition on modern slavery and human trafficking clause in our standard terms and conditions. Our legal and procurement teams are committed to ceasing business with any suppliers or contractors found to be involved in modern slavery or human trafficking either directly or in their supply chain.

## **Risk assessment and Management**

Flagship's standard terms and conditions refer to the fact that slavery and human trafficking are not acceptable to Flagship. Flagship's standard contracts require suppliers to comply with Flagship's policies which include modern slavery. Flagship has reviewed its supply chain and concluded that there is a low risk of slavery and human trafficking because of the nature of both the suppliers and the goods and services purchased.

## **Key performance indicators to measure effectiveness of steps being taken**

Our spend with our top 20 suppliers (including the percentage of overall spend that represents) is monitored annually and reported to Board.

We have a Modern Slavery and Anti-Human Trafficking Policy which is updated annually and approved by the Flagship Board. Responsibilities for compliance, implementation and reporting are specified in the policy. The effectiveness of the policy is measured through training uptake and monitoring of the Whistleblowing register for any Modern Slavery reported and action taken.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 March 2024.

This statement was approved by the Flagship Group Board on 7th August 2024.

A handwritten signature in black ink, appearing to read 'E. Marcus', is positioned above the printed name of the signatory.

Edward Marcus – Director Legal and Governance (Company Secretary)  
Flagship Housing Group Limited  
Date: 7 August 2024