



Modern Slavery and Human Trafficking Statement

Introduction

The Modern Slavery Act 2015 ('the Act') seeks to prevent the exploitation of workers and to stop human trafficking.

At Yorkshire Housing we do not tolerate any form of exploitation, and we are committed to preventing modern slavery and human trafficking in our business and our supply chains, including taking steps to ensure that companies operating within our supply chains comply with the principles in the Act.

As a registered provider of social housing we operate with a strong sense of social purpose and ethical responsibility. Our work is focused on supporting the welfare of our customers, including those who are vulnerable or require additional support to live independently. We also have a strategic aim to be an Employer of Choice for all colleagues who choose to work with us.

This statement sets out the steps Yorkshire Housing has taken to address slavery and human trafficking during the financial year 1st April 2023 to 31st March 2024.

Structure of Yorkshire Housing

Yorkshire Housing employs approximately 850 people and provides housing related services to approximately 20,000 homes across the Yorkshire region. Our business activity is entirely UK based.

The majority of our services relate to homes we own and rent within the region. We also operate a facilities management service to homes on the Swarcliffe estate in Leeds under a PFI contract, provide housing with independent living support services and carry out Home Improvement Agency work.

Policies, Training and Awareness

Our policies operate in line with the principles of the Act and help to prevent cases of modern slavery throughout our business. Our policies are clear that no form of slavery or exploitation will be tolerated and are reviewed frequently to ensure they remain up to date.

The specific policies and procedures that address our approach to addressing modern slavery and human trafficking are set out below:

Safeguarding

We recognise that identifying and preventing slavery and human trafficking is mainly an issue of human welfare. Our Safeguarding Policy sets out clear procedures to identify, report and refer cases to the appropriate authorities where appropriate and any colleague may report concerns about modern slavery using our internal safeguarding reporting system.

To support this, safeguarding training for all colleagues is mandatory to ensure that everyone who works for Yorkshire Housing has good awareness of situations which suggest vulnerable people may be being exploited. This training includes spotting the signs of potential exploitation of our customers. The principles included in our training can be equally applied to the exploitation of colleagues or other people we work with.

A Safeguarding Lead is in post to provide specialist support and advice to the business where required, and Safeguarding representatives are appointed within each business area. Further specialist training is provided to these employees in addition to the core programme.

Whistleblowing

We support anyone working directly for us or indirectly within our supply chain to raise concerns, in confidence, about any criminal offences including modern slavery or human trafficking.

Our Whistleblowing Policy and Procedure is well established and is designed to make it easy for anyone to make a disclosure without fear of retaliation.

Code of Conduct

Our Code makes clear to all colleagues the behaviour that is expected from them when representing our organisation. We strive to maintain the highest standards of conduct and ethics in all aspects of our work.

To further raise awareness of Modern Slavery and the role staff and tenants can play in identifying and preventing it, we have developed a communications strategy. This centres around anti-slavery day but operates throughout the year.

In addition to the above, all prospective tenants must provide evidence of their eligibility to remain in the UK before they are offered a home, which is stipulated within our vetting procedures. This is a measure used to help ensure our tenants have not been subject to illegal trafficking.

We also engage with third party specialist providers and our network of housing sector and local authority partners to identify up to date advice and guidance, sourcing training from subject experts where this is available.

Procurement and Supply Chains

We are committed to ensuring that our supply chain adheres to the highest standards of ethics and we only work with suppliers and contractors who fully comply with the Modern Slavery Act, who sign up to our policies and where applicable, understand the needs of the vulnerable people we work with.

The supply chains of some parts of our business are complicated. Each area of our business has explicit responsibility to comply with our Procurement Policy and procedures and to regularly review its supply chain to identify areas of risk of modern slavery and human trafficking.

Yorkshire Housing is UK based sourcing goods and services from predominantly UK based suppliers whose supply chains extend globally however we are committed to using local firms wherever possible, which allows us to develop close working relationships.

We undertake robust due diligence for all suppliers, contractors, and procure new contracts regardless of value and provision of service, to ensure the right steps are undertaken that are designed to mitigate the risk of slavery and human trafficking in our supply chains.

This statement extends to all our suppliers and contractors as well as their subcontractor and confirmation of this is required as part of the tendering and new supplier or contractors process.

Should any unethical or high-risk practices be identified or observed by Yorkshire Housing with any supplier, contractor or subcontractor this will be investigated and, appropriate steps taken to remedy matters, including terminating third-party relationships where necessary.

The Supplier Assessment Form asks whether suppliers are defined by section 54 of the Act and if so questions compliance with the annual reporting requirements. The form also asks suppliers to demonstrate that their workforce is free from exploitation and where turnover is above £36m provide a copy of their Modern Slavery Statement. The form is reviewed by Finance using an Evaluation Matrix which then requires approval by the Procurement Service and Head of Service.

Yorkshire Housing ensure all formal tendering activities are in accordance with legislative and ethical requirements. This considers Modern Slavery to ensure that to the best of our knowledge the companies we procure from are responsible and paying the living wage, as required, have not breached and comply YH policies under the Modern Slavery Act 2015.

We make good use of established frameworks, which ensures that the suppliers used will have already undergone a higher level of due diligence such as Crown Commercial Service (CCS) who have a government wide strategy to tackle this issue.

<https://www.crowncommercial.gov.uk/news/tackling-modern-slavery-what-ccs-is-doing>

Where that is not possible, suppliers will demonstrate their compliance via the Supplier Assessment Form detailed above (paragraph 7 of this section).

Beyond that our formal contracts do have a right to audit, although we have not exercised this. In practice that would mean a physical inspection of offices and records if we suspected a breach of the legislation.

Whilst we recognise that no supply chain can be considered entirely free from the potential for slavery or human trafficking to occur, and we believe the above checks are proportionate to both our legal and moral compass in endeavours to avoid procuring from any supplier in breach of the Act.

We manage a framework of contractors who must sign up to Yorkshire Housing's policies to work on our behalf. All new contractors are required to confirm they comply with our policies and the Act. Anyone bidding for work must confirm that they comply with the Act before submitting a bid. An annual review of all framework contractors takes place to ensure that supporting documentation is up to date and relevant. These confirmations give us some confidence in our supply chain, but it is recognised that this does not completely mitigate the risk, especially of long supply chains where we have no right to audit.

Our business uses agency workers for some activities. We have a multiple preferred supplier lists for agency workers who manage the supply of workers to us. We only use specified, reputable employment agencies to source labour that comply with the due diligence in this statement. We believe this reduces the possibility of trafficked workers being used within Yorkshire Housing.

We have identified construction as a sector which represents a higher risk, especially with our development programme. All contracts are mandated to conform to our Adult and Child Safeguarding Policy and are provided with a specific poster, flow chart and briefing note, which can be audited at any time.

We identified that our Site Inspectors were most likely to identify Safeguarding and Modern Slavery concerns on site. We have documentation used to carry out site inspections, which includes a field to prompt consideration of any Safeguarding and Modern Slavery issues and details the reporting process. Modern Slavery and Safeguarding is a standing agenda item at monthly site meetings.

All sites are registered with the Considerate Constructor Scheme (CCS) which is an independent body who assess contractors to ensure right to work vetting is undertaken for their own staff and those employed through sub-contract. They are also expected to undertake training and operate a Whistleblowing Policy

Our Procurement Policy and will be updated in 2024 in line with the new Procurement Act. This includes for a strengthening of the approach to excluding suppliers where there is clear evidence of their involvement in Modern Slavery practices (disbarment list). The Policy also includes a Statement on modern slavery, along with how to be a responsible business (social value) and sustainability.

Colleagues and other workers

We treat all our colleagues fairly and have robust measures in place to ensure this, including:

- Robust recruitment processes including verifying people's identity and their right to work in the UK before starting work with us.
- Monitoring rates of pay and the calculation of the legal deduction of wages,
- Paying at least the Voluntary Living Wage, or approved apprentice salaries, and providing a range of core organisational benefits.
- Offering a free 24-hour employee assistance programme to all colleagues and their immediate household that provides advice and counselling, including legal advice.
- Ensuring that colleagues take frequent breaks and are not encouraged to work in excess of the number of working hours permitted by law.
- Making salary payments directly to employees and not delaying or withholding payments without prior notification and in line with our policy.

Effectiveness

As an organisation Yorkshire Housing strive for continual improvement. Regular reviews, led by the Head of Governance are in place to discuss, agree and undertake actions to enhance our processes to further mitigate the risks and ensure awareness throughout our organisation.

Approval

This statement covers the full financial year 1st April 2023 to 31st March 2024

It was approved at the Yorkshire Housing Limited Board on 14th August 2024

Signed

Signed by:

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Ingrid Fife, Chair of the YHL Board