



MODERN SLAVERY STATEMENT

2020-2021

Creating more places for people to thrive
and be recognised as a sector leading landlord



The Modern Slavery Act 2015 (the Act) requires organisations supplying goods or services with a turnover of above £36 million to prepare and publish an annual Modern Slavery Statement.

The Statement must set out the steps an organisation has taken, if any, during its financial year to ensure that slavery or human trafficking is not taking place in its business or supply chain.

We're publishing this statement to set out what we've done to recognise and prevent potential incidences of modern slavery during the Financial Year 2020-2021.

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Structure and vision

As a registered social housing provider, we pride ourselves on providing homes which help people live independently and enables them to get on and off the property ladder at different stages of their lives.

With more than 29,000 homes across the North West, Yorkshire and Midlands, the business has a large and diverse portfolio.

We operate, through our subsidiaries, across the whole of the property chain from initial procurement of sites, through planning to the delivery and management of high quality communities across a range of tenure types and housing solutions.

We deliver services to a range of stakeholders including tenants, landlords, house buyers and local authorities.

Among the Group's key operating subsidiaries are its largest, and primary housing stock owning company, Your Housing Limited. Our development initiatives are operated through Nuvu Development Limited and our repairs and maintenance service is undertaken by our in-house contractor, fix360.

YHG is committed, as both an employer and as a landlord, to running our business responsibly. By creating more places to thrive, we will protect and enhance the communities we work for and with.



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Assessing and managing risk

As a housing organisation, our key risks lie in our supply chains, such as construction and supply of materials and in the potential vulnerability of people living in our homes. We have described these in more detail below.

Risks are assessed through our Safeguarding Operational Group which meets to discuss our duties under the Modern Slavery Act and concerns or incidents of safeguarding, some of which could fall under the act and any issues are escalated if required. Modern Slavery also forms a standard item on the agenda for our Equality and Diversity Steering Group, which meets on a quarterly basis.

Any concerns or issues in relation to Modern Slavery are recorded and monitored on the risk management system and any issues are escalated as appropriate.

Although the Group has not identified a specific Modern Slavery risk, we assign appropriate actions addressing any risks connected to modern slavery against the risks on our risk register relating to compliance with procurement legislation and inconsistent contract management, which we believe is appropriate to the size and scale of our operations.

Our policies and procedures

We continue to review and develop our existing policies and procedures in light of the Act in accordance with a review programme. We are confident that our policies promote good behaviour among our colleagues both at work and within our supply chain.

Our policies and procedures are kept under review to make sure that they reflect the Group's evolution and our regulatory and statutory obligations. We have a number of policies and procedures in place, all of which are subject to regular review and supported by Board and senior management, that contribute to ensuring modern slavery does not occur in our business or supply chain which include:

- Employee Code of Conduct
- Antisocial Behaviour and Hate Crime Policy
- Probity Policy
- Equality, Diversity and Inclusion Policy
- Anti-Fraud, Bribery and Fraud Risk Management Policy
- Health, Safety and Wellbeing Policy
- Whistleblowing Policy
- Domestic Abuse and Safeguarding Policies
- Operational Standing Orders
- YHG Procurement Procedures
- Disciplinary Procedure
- Recruitment and Selection Procedure
- Grievance Procedure.

Our Procurement Procedure, Procurement Team Guidance and Contract Management Procedures provide enhanced governance around tendering and supplier selection and strengthen due diligence in the supply chain in relation to Modern Slavery into our processes and procedures. The Guidance and any associated procedures are updated regularly, with the most recent update taking place during May 2020.



Due diligence

We aim to ensure that our due diligence procedures are appropriate to our modern slavery risk and the level of influence the Group has.

An important element of these are the Procurement Procedure, Procurement Team Guidance and Contract Management Procedures as previously mentioned.

Surveys with current suppliers are undertaken as part of initial checks with suppliers however we recognise that these need to be reinforced with on-site checklists training to ensure all staff are vigilant on sites or when dealing with suppliers.



Training

We have discussed the Act at our Risk and Compliance Group to understand our duties and our Board has reviewed the annual statement and provided oversight to our approach.

At our Safeguarding Operational Group we have discussed our duties under the Modern Slavery Act and explained what modern slavery is to staff.

We believe training is crucial to addressing the risk of modern slavery and human trafficking occurring in our properties and supply chains. To ensure a high level of understanding of the risks, we have provided training through our tiered Safeguarding Training Courses. The training was reviewed and updated during 2020/2021 to ensure that it remains relevant and reflects existing best practice and a new learning management system introduced which supports our training delivery. Level 1 online safeguarding training is mandatory for all employees and further levels are undertaken by relevant members of staff, typically “front line” staff working in our communities.

Our modern slavery training has been reviewed and a new course developed and made available. This has become mandatory for all frontline staff who require Level 2 safeguarding training, as well as for other staff whose work may have an impact on helping to identify, tackle and prevent modern slavery such as those working in procurement, finance and governance. Safeguarding training compliance is monitored at the **Risk and Compliance Group** and the **Safeguarding Operational Group**.

Our procurement team has completed the CIPS accredited Modern Slavery Certificate during 2019 to further increase awareness of modern slavery issues and will refresh this training on an annual basis.

In 2020/21 we have introduced a safeguarding section on the intranet which has a dedicated section to increase awareness and understanding of Modern Slavery. The statement will be highlighted to all relevant colleagues through our **Safeguarding Policy** and the **Modern Slavery and Human Trafficking training**.



Supply chains

We have an in-house procurement team consisting of five, full-time colleagues who provide procurement, sourcing and supply chain expertise to the business following the Procurement Team procedures that are embedded across the Group.

We review our suppliers annually and during 2020/2021 had 940 suppliers, who are used to deliver a range of goods, works and services across the Group.

The Procurement Team has set procedures for the assessment and due diligence of suppliers to address the supply chain risk. This includes use of the standard Selection Questionnaire or eligibility questions including specific questions on Modern Slavery which asks all bidders to demonstrate that they comply with the Act. Our standards are all fully compliant with all legislation relating to public procurement, including those around Modern Slavery.

All our standard contracts contain clauses and contractual requirements that our suppliers do not engage in any activity that is contrary to the Act. As contracts are renewed or retendered, the Procurement Team ensure that any relevant terms and conditions are included within any new agreements.

The Procurement Team maintain a register of all contracts and approve all new suppliers to the business ensuring that they meet our eligibility criteria including Modern Slavery. We have also developed our own modern slavery checklist for the Procurement Team to use with suppliers at site visits as part of the evidence process.

Our suppliers have been mapped to identify those who carry the greatest risk to our business which incorporates modern slavery as a risk. The goods, works and services that we typically purchase tend to be from industries that are highly regulated such as law, asset safety, compliance and are therefore of a lower risk for modern slavery. However, we continue to enhance the assurances we seek from supply chain members as to their avoidance of modern slavery and human trafficking. For those suppliers we use in higher risk supply chains, such as construction and supply of materials, where the supply chain may be longer and include the use of temporary or agency workers, we conduct additional checks such as site visits using our checklist.



Recruitment

We are not exposed to a high risk of recruiting staff who may have been subject to human trafficking, however our recruitment and selection process contains relevant requirements in terms of checking of eligibility to work in the UK and carrying out the necessary checks such as DBS (Disclosure and Barring Service).

For every successful application, we check proof of eligibility to work in the UK; this initially is by way of a question upon application and then verification of relevant documentation before/after interview. This is by production of a valid passport, or via other means such as a full birth certificate.

For roles that require DBS clearance; each relevant role clearly states the requirement for DBS and the level of DBS associated with that role and the relevant DBS is undertaken for all offered candidates where it is a role requirement.

References are also taken for every potential new starter covering two years full career history and a minimum of two references – if there are any gaps in employment greater than one month we will investigate and clarify the gap and where possible, seek a character reference.

All pre-employment checks including the Right to Work in UK, qualification checks, interview notes, evidence of recruitment and budget approval have to be received and signed off prior to an employment start date being agreed.



Our on-going commitment to the Modern Slavery Act 2015



We are committed to ensuring as far as possible that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our commitment is to act ethically and with integrity in all our business relationships and to implement effective systems and controls to ensure slavery and human trafficking is not taking place.

We are further committed to making sure that our properties are not used to accommodate the work of human traffickers or detain others for servitude and work with a range of agencies, including the police and local authorities to ensure that information is shared, and action is taken if necessary.

In support of this, a Modern Slavery Action Plan, based on guidance issued by the Home Office, has been reviewed and approved to include actions further aimed at combatting Modern Slavery in any part of our business or in our supply chain. The plan is on track with actions achieved and progress reported to the appropriate body.

Further actions for 2021/22 are also planned to enhance our commitment as well as continuing to embed current activity to ensure that addressing issues of modern slavery is business as usual.

This includes further development of the training on offer and ensuring all staff are aware of their duties regarding Modern Slavery and what steps to take if they suspect abuse, undertaking monitoring questionnaires with our suppliers and continuing to adapt our activities taking into account the changes caused by Covid-19.

Public procurement is highly regulated and we are subject to the rules and due diligence around this. All suppliers been through rigorous process and we follow up on this through monitoring and using market intelligence. All our procurement activity is governed by these regulations.

Oversight of the Modern Slavery agenda is monitored through the Equality and Diversity and Risk and Compliance Groups and any issues escalated to the Group Board. Risk and Compliance Group and Group Board are also responsible for approving the action plan and annual Statement.

Declaration

This statement has been approved by the Group Board of Directors and is made pursuant to section 54(1) of the Modern Slavery Act 2015.

Signed

Director of Governance and Risk, including Group Company Secretary

22 July 2021