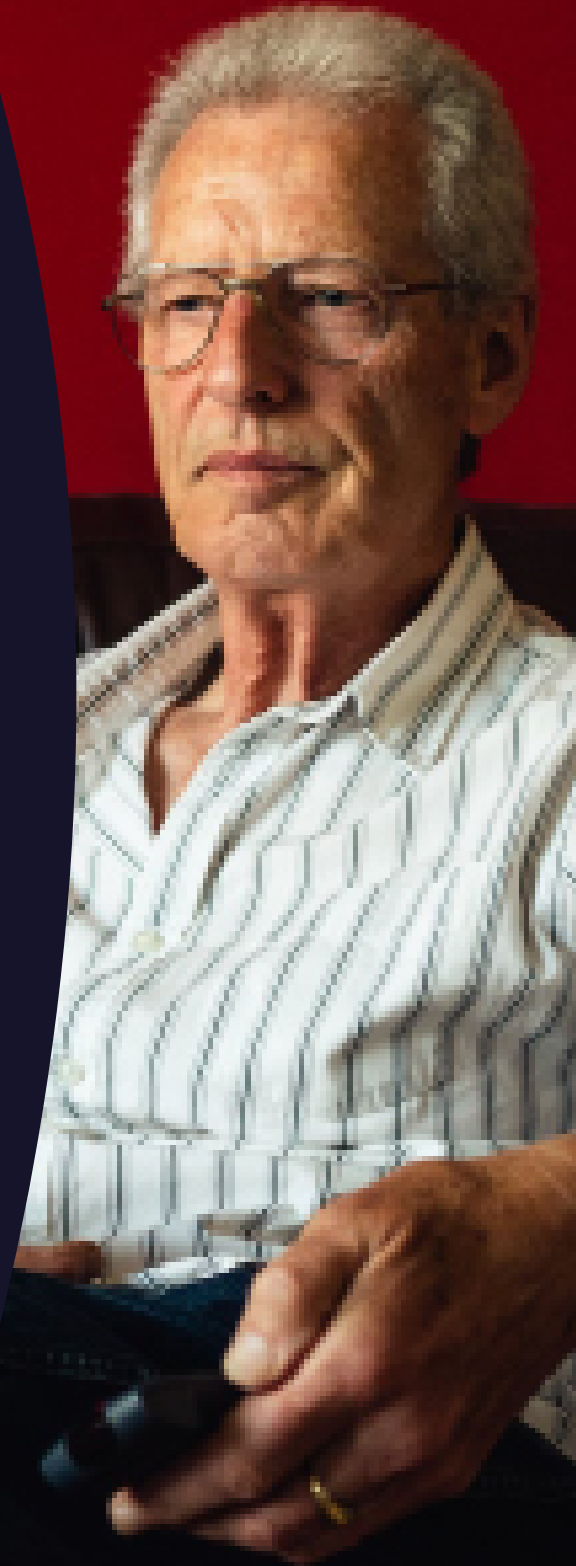


# Modern Slavery Statement

**2024 - 2025**

Through our **passion** for housing, more  
**people** have a **safe** place to call **home**



## Contents

The Modern Slavery Act 2015 (the Act) requires all 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. Your Housing Group (YHG) is publishing this statement setting out what it has done to recognise and prevent potential incidences of modern slavery in the Financial Year 2024-25

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## Structure and vision

**YHG is a registered social housing provider, providing approximately 29,000 homes primarily in the North-West of England.**

**YHG's vision is "Through our passion for housing, more people have a safe place to call home" and that's where residents feel supported, connected to their community, and have a stable foundation to grow and thrive**

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.

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



**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.**

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 in line with YHG's risk management framework.

Risks of a safeguarding nature are reviewed by YHG's Safeguarding and Domestic Abuse Operational Group which meets to discuss our approach to safeguarding including our duties under the Modern Slavery Act. Concerns or incidents of safeguarding, some of which could fall under the Act, are managed by the relevant frontline team and escalated to managers and the designated Safeguarding Officer if required.

We consider risks to the organisation and its supply chain, including modern slavery, across a number of channels in YHG and will escalate any concerns to the monthly Risk and Compliance Group, which has representation across the business including members of the Leadership Team. The Risk and Compliance Group will also review the modern slavery action plan. Modern Slavery also falls under the agenda of YHG's Balance for Better Group (EDI group).

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

### **We continue to review and develop our existing policies and procedures in light of the Act and in accordance with the YHG Policy Framework.**

We are confident that our policies promote positive behaviour among our colleagues both at work and within our supply chain – for example, case audits are completed on a regular basis to ensure our Safeguarding Policy and procedures are adhered to.

Our policies and procedures are kept under review to make sure that they reflect the Group's development and our regulatory and statutory obligations. Policies are developed and reviewed in alignment with our strengthened approach to customer engagement and consultation. We have a number of relevant 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.

#### **These include:**

- Employee Code of Conduct; Board Code of Conduct
- Anti-Social Behaviour and Hate Crime Policy
- Probity Policy
- Equality, Diversity and Inclusion Policy
- Vulnerability Support for Customers and Reasonable Adjustments Policy
- Counter Fraud Policy
- Health, Safety and Wellbeing Policy
- Whistleblowing Policy
- Domestic Abuse Colleague Disclosure Policy
- Domestic Abuse Customer Policy
- Safeguarding Policy
- YHG Procurement Procedures
- YHG Contract Management Procedures
- Disciplinary Procedure
- Recruitment and Selection Procedure
- Grievance Procedure

Our YHG 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 April 2025 including updates for the Procurement Act 2023.

In relation to safeguarding, we have a team of Designated Safeguarding Officers. Our role as a housing provider is to identify safeguarding concerns and make sure that they are raised with the relevant agencies.

Safeguarding concerns can be raised in a number of ways. They may come from customer contact with Housing Management, Income and Contact Centre teams; a contractor or YHG Repairs and Maintenance Operatives following a visit to a customer's property; contact from statutory agencies or a disclosure from a customer themselves. Concerns are recorded and managed using our DATIX management software.

Individual colleagues will review and investigate the concern and identify what action is needed, in line with our policies and procedures, including whether social care or other statutory services need to be alerted, or asked to provide care or support. Where a case is not accepted by social care and we believe this is not the correct decision, colleagues are supported to challenge appropriately using the local authority's own professional challenge and escalation procedures.



### **We aim to ensure that our supplier 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. These were updated in April 2025 to take into account the changes brought in from the Procurement Act 2023 in February 2025.

We use the Procurement Specific Questionnaire for supplier due diligence including questions on compliance with the Modern Slavery Act, and review of suppliers' modern slavery statements or policies/procedures as appropriate to the contract or commodity being procured. We tailor these questions where appropriate to the commodity being purchased based on its risk level.

In 2024-25, the Procurement Team have reviewed the guidance from PPN 009: Tackling modern slavery in government supply chains and use the guidance when assessing risks of modern slavery associated with different contracts and procurement activity. In line with the guidance in the PPN YHG's Procurement Team have produced an on-site checklist for our contract managers to use, ensuring all staff are vigilant for signs of modern slavery on sites or when dealing with suppliers.

During Safeguarding September, we delivered specifically developed safeguarding training which raises awareness about modern slavery.

### **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 and Domestic Abuse Operational Group we have discussed our duties under the Modern Slavery Act and explained the definition of modern slavery to colleagues.

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 these risks, we have provided training through our tiered Safeguarding Training Courses. Level 1 online safeguarding training is mandatory for all employees, and further levels are undertaken by relevant colleagues - typically frontline colleagues working in our communities.

Our modern slavery training is mandatory for all frontline colleagues who require Level 2 safeguarding training, as well as for other colleagues whose work may impact the identification, prevention, and tackling of modern slavery - such as those working in procurement, finance, and governance. Safeguarding training compliance is monitored by both the Risk and Compliance Group and the Safeguarding Operational Group.

As of July 2025, completion of mandatory Level 1 safeguarding training stood at 91%, while Level 2 safeguarding training was at 94%.

We are working with our Learning and Development team to review training requirements against role profiles. Following feedback from the business, face to face safeguarding training has been piloted to complement and strengthen our online offer and was initially delivered during Safeguarding September in 2024 and then rolled out to Housing Management teams during January to March 2025. Two levels of training were designed:

- **Awareness level** to help colleagues recognise and report safeguarding concerns
- **Frontline level** to help colleagues who are active in managing cases.



A total of 139 colleagues were trained and following the training colleagues reported that they felt more confident in managing safeguarding cases, particularly cases which involved challenging social care decisions and escalating concerns.

The Safeguarding team will do one in person training session each quarter for new colleagues and as a refresher for existing colleagues.

YHG Procurement colleagues all hold the CIPS accredited Ethical Procurement and Supply certificate to further increase awareness of modern slavery issues, and we refresh this training on an annual basis. All colleagues in the Procurement team are members of CIPS and sign up to the CIPS Code of Conduct as part of this. In August 2024, the Head of Procurement delivered Contract Management training with key colleagues across the Group who are involved in the management of suppliers and contracts. This training had a specific section on modern slavery and how through contract management practice the Group can manage this risk.

To further support learning, we have a regularly updated Safeguarding Hub on the intranet which has a dedicated section to increase awareness and understanding of modern slavery. This reflects the more modern way in which people learn and supports our training. The statement will be highlighted to all relevant colleagues through our Safeguarding Policy and the Modern Slavery and Human Trafficking training.

**YHG has its own 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 YHG.**

YHG reviews its suppliers annually and during 2024/2025 had 786 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 Procurement Specific Questionnaire or eligibility questions including specific questions on modern slavery which asks all bidders to demonstrate that they comply with the Act. These questions are tailored to the risk level of the commodity being purchased with enhanced checks for those suppliers in higher risk sectors such as construction. 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. YHG has also developed its own modern slavery checklist for all colleagues 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 YHG typically purchases 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, YHG continues to enhance the assurances we seek from supply chain members as to their avoidance of modern slavery and human trafficking. For those suppliers YHG uses 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, YHG conducts additional checks such as site visits using our checklist or at tender stage.

**We are not exposed to a high risk of recruiting colleagues 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 with proof also of National Insurance Number.

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 discuss with the candidate and for a safer recruitment role we will investigate, clarify the gap and 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 ongoing 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 some actions continuing, to enhance our commitment and embed current activity as part of our focus on continuous improvement. Progress is reported to the appropriate body.

This includes working towards attaining the Domestic Abuse Housing Alliance Accreditation, and continuing to raise awareness of modern slavery and safeguarding across the business.

Public procurement is highly regulated and YHG is subject to the rules and due diligence around this. All suppliers have been through a rigorous process, and we follow up on this through monitoring and using market intelligence. All our procurement activity is governed by these regulations which includes the introduction of the Procurement Act 2023.

Oversight of the Modern Slavery agenda is monitored through the Risk and Compliance Group 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.



**Executive Director of Corporate Services and Group Company Secretary**

August 2025

 [yourhousinggroup.co.uk](https://yourhousinggroup.co.uk)



Through our **passion** for housing, more **people** have a **safe** place to call **home**

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