

YHA Modern Slavery and Human Trafficking Act Transparency Statement

1. Introduction

This statement sets out YHAs commitment to improve practices and procedures to combat modern slavery and human trafficking. We will put in place steps aimed at ensuring there is no slavery or human trafficking in our business and our supply chains. Should our employees have any concerns regarding likely risk, or breach of this policy or regulations they should not hesitate to raise this with their line manager, who should escalate to the CEO.

2. Organisational structure and supply chains

YHA (England & Wales) Ltd. is a registered charity with the objective “To help all, especially young people of limited means, to a greater knowledge, love and care of the countryside, and appreciation of the cultural values of towns and cities, particularly by providing a hostel or other accommodation for them in their travels, and thus to promote their health, recreation and education”. YHA was established in 1930 and employs approximately 1300 people. YHA aims, in partnership with its supplier chain, to minimise the impact slavery and human trafficking in the UK and internationally.

3. Diligence Process

YHA undertakes a process of due diligence on new suppliers and contractors, and regular reviews of existing suppliers. This process includes a questionnaire to capture detailed information about each company within the supply chain. Each company will be required to demonstrate due diligence in their processes. Should it become necessary we will arrange unannounced audits. This process will also enable us to:

- Identify and assess potential risk within our supply chain.
- Scrutinize the supply chain to assess particular product or geographical risks of modern slavery and human trafficking.
- Mitigate and resolve any risk within our supply chain.
- Identify any risks as High, Medium or Low and take appropriate action.
- Monitor risk within our supply chain and conduct audits if necessary.
- Take steps to ensure substandard suppliers' implement appropriate action plans
- Protect whistleblowers.

- Participate in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular such as participation in Ethical trading initiatives.
- Invoke appropriate sanctions against suppliers who fail to improve their performance in line with an action plan, which could include termination of the business relationship.

4. Compliance with Processes, Values and Ethics

YHA has a dedicated person to manage our supply chain. However, other people within the organisation will contribute their knowledge and expertise to the process, namely:

- Finance
 - HR
 - Commercial
 - Sales
 - Property / Estates
- a. Risk assessments: We have an organisational risk register, supported by a Risk Management Group, headed by the Property Director, which meets regularly, and where modern slavery and human trafficking is a standing agenda item.
 - b. Investigations/due diligence: YHA will not hesitate to undertake an investigation in relation to known or suspected instances of slavery and human trafficking.
 - c. Training: YHA will provide appropriate training, awareness and refresher training as appropriate to key managers, and YHA will ensure that modern slavery and human trafficking awareness training is available to all employees & volunteers.
 - d. Communications: YHA will ensure all employees are aware of our commitment to combatting modern slavery and human trafficking as well as the policy via internal communications including the intranet.

5. Relevant policies

YHA has associated policies which describe its approach to the identification of modern slavery and human trafficking.

- a. Whistleblowing policy: All employees are encouraged to report any concerns related to direct activities, or the supply chains, which includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.

- b. Employee code of conduct: The code, published on the YHA intranet, makes clear to employees the actions and behaviour expected of them when representing the organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when managing our supply chain.
- c. Supplier conduct: We are committed to ensuring our supply chain adheres to the highest standards of ethics. Suppliers are required to demonstrate they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. However, serious violations of the supplier code of conduct will lead to an investigation and possible termination of the business relationship.
- d. Recruitment policy: When necessary, we use only specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting people from that agency. YHA conducts “right to work” checks on every employee within its employment at induction. We expect all our supply chain to perform the same checks in accordance with the Immigration, Asylum and Nationality Act 2006.

6. Performance indicators

YHAs key performance indicators (KPIs) in light of the Modern Slavery Act 2015 are:

- Publish a Transparency Statement identifying YHA’s commitment in its relationships with its employees, guests and suppliers to take all necessary actions to assist in eradicating Modern Slavery & Human Trafficking, by the end of February 2016.
- Complete a review of our supply chain database and identify by risk and value a systematic approach to managing the process for scrutinizing and approving suppliers , by end of February 2017.
- Make available training to employees as to YHA’s expectations of them in respect of Modern Slavery & Human Trafficking, by the end of February 2017.
- Publish a Modern Slavery Policy by the end of February 2017.
- Publish a final statement on the YHA Website by the end of August 2017, and conduct a review of that statement annually thereafter.

7. Training

YHA requires key people to have an awareness of the Modern Slavery Act 2015 and how to manage the supply chain through effective procurement. All employees have access to awareness training in relation to Modern Slavery & Human Trafficking and to all of the associated policies via the YHA intranet. The training covers:

- The definition of Modern Slavery

- Who is likely to be affected
- The different types of modern slavery
- Identifying slavery & reporting it

This statement has been approved by the YHA Executive and Board of Trustees, who will review and update the policy annually.

Review – March 2022

Since establishing the above, YHA has undertaken the following work:

1. In August 2018 YHA published its first annual revision to the statement in respect of Modern Slavery and Human Trafficking on its website www.yha.org.uk under the heading Compliance and Statutory Policies.
2. YHA has taken the decision to revise and to resubmit the online training module covering the subject of Modern Slavery & Human Trafficking to all YHA employees, beginning in September 2022, and further to extend the training once again to all YHA Franchisees. The training is now included in all induction training for employees joining YHA.
3. A review of the YHA Policy in respect of Modern Slavery & Human Trafficking has been undertaken to ensure that the Policy remains relevant and sufficient in its content and application.
4. YHA is continuing to revise and improve its “[Supplier Code of Conduct](#)” to incorporate the requirements of the Modern Slavery & Human Trafficking Act 2015. This work will be ongoing throughout 2022.
5. YHA’s Procurement Department has begun an exercise in contacting initially all of its 22 major suppliers, gathering their Environmental, Social and Governance information in support of its commitment to the principles of the Modern Slavery and Human Trafficking Act 2015.
6. YHA has reviewed its procedure under which any actual or potential breaches of the act will be recorded on the “YHA Safeguarding Log” or “YHA Serious Incidents Log” and will be discussed by the Risk Management Group, or the Safeguarding Panel as appropriate.

Review – September 2023

Since establishing the above, YHA has undertaken the following work:

1. In August 2018 YHA published its first annual revision to the statement in respect of Modern Slavery and Human Trafficking on its website www.yha.org.uk under the heading Compliance and Statutory Policies.

2. YHA has once again taken the decision to revise and to resubmit the online training module covering the subject of Modern Slavery & Human Trafficking to all senior YHA employees, beginning in September 2023, and further to extend access to the information regarding Modern Slavery and Human Trafficking to all YHA Franchisees. The training is now included in induction training for relevant employees and Franchisees joining YHA.
3. A review of the YHA Policy in respect of Modern Slavery & Human Trafficking has been undertaken to ensure that the Policy remains relevant and sufficient in its content and application.
4. YHA has now completed a final draft of its "[Supplier Code of Conduct](#)" incorporating the requirements of the Modern Slavery & Human Trafficking Act 2015, and placing responsibility upon suppliers to conform with eleven specific tenets of the code, protecting workers in the supply chain from all forms of discrimination, exploitation and inappropriate or illegal control. This draft has now gone for ratification to the Associate Directors at YHA, following which it will be published as part of YHA's revised Procurement Policy later in 2023, and our Suppliers will be briefed accordingly.
5. YHA's Procurement Department has now concluded the exercise of contacting initially all of its 22 major suppliers, gathering their Environmental, Social and Governance information in support of its commitment to the principles of the Modern Slavery and Human Trafficking Act 2015. This information will now be scrutinised and analysed by the Procurement team, and will inform the revision of YHA's Procurement Policy which will be ratified and published later in 2023.
6. YHA has reviewed its procedure under which any actual or potential breaches of the act will be recorded on the "YHA Safeguarding Log" or "YHA Serious Incidents Log" and will be discussed by the Risk Management Group, or the Safeguarding Panel as appropriate. The requirement to report as "serious or material incidents" actual or potential breaches of the act identified by YHA's Franchisees, will be enshrined in the new YHA Franchise Agreement, which will be published later in 2023.