

Modern Slavery Statement 2025/26

Introduction

This statement is made in accordance with Part 6 Section 54 (1) of the Modern Slavery Act 2015 and constitutes Hightown Housing Association's (Hightown) modern slavery statement for 2025/26.

Hightown operates a zero-tolerance policy towards modern slavery and human trafficking and will take steps to prevent it occurring in any part of our business and in our supply chains, including promptly investigating any suspicions and immediately reporting confirmed cases.

We have controls and checks in place for all colleagues, including agency workers. We recognise that certain areas of our operations, particularly within care services where agency staffing is more prevalent, may present increased vulnerability. As such, we continue to strengthen our due diligence, monitoring, and safeguarding practices in these areas to mitigate risk.

This statement has the support and approval of our Board. Our colleagues are expected to report any reasonable suspicion that modern slavery and human trafficking is taking place.

About Hightown

Hightown is a charitable housing association, with exempt charity status, regulated by the Regulator of Social Housing. We are a registered society under the Co-operative and Community Benefit Societies Act 2014 and we operate entirely in England and almost exclusively in highly regulated sectors, including care and support. Many of our contracts are with public sector organisations.

Hightown is a single legal entity with no subsidiaries or joint ventures. Our team of over 900 colleagues, supported by contractors and suppliers, manage over 9,500 properties across Hertfordshire, Bedfordshire, Buckinghamshire and Berkshire. Wherever possible, Hightown sources its goods and services from UK based suppliers.

Hightown's Policy Framework

Hightown's policies reflect our commitment to acting ethically and to implementing robust systems and controls to ensure that modern slavery and human trafficking are not taking place within our business or our supply chains. Our Procurement Strategy alongside a number of our policies contribute to guarding against modern slavery, and we review these on a regular basis, namely:

- Safeguarding Adults and Children Policy
- Whistleblowing Policy
- Equality & Diversity Policy
- Anti-bribery Policy
- Recruitment Policy
- Anti-bullying, Harassment and Victimisation Policy
- Grievance Policy
- Health & Safety Policy
- Conflicts of Interest Policy
- Codes of Conduct, including Supplier Code of Conduct

Modern Slavery Risk Assessment and Due Diligence

The nature of our business means that we operate in heightened risk areas of modern slavery. This includes activity that is taking place in our homes and the following supply chains:

- Construction and operational maintenance.
- Care services.
- Recruitment activities e.g. engagement of temporary and agency workers in care services.

In the period since the introduction of the Modern Slavery Act, and in the past year, we have not become aware of any instances of slavery or human trafficking relating to our business and we consider this as a key indicator for measuring our performance in preventing modern slavery and human trafficking.

We have numerous processes in place that allow us to manage the risk of slavery or human trafficking within our business activities, including:

Development

Construction labour suppliers are particularly susceptible to modern slavery. Our development contracts include a clause requiring compliance with the Modern Slavery Act 2015 and we make use of our colleagues and Employer's Agents to monitor the activities on development sites and report any concerns.

Recruitment and Working Practices

With robust HR processes and controls, we have assessed the risk of slavery and human trafficking occurring in our internal operations and consider the risk to be low. Checks on original documents such as passports and other forms of identification are carried out as a standard practice.

All Hightown colleagues are treated fairly and equally, and we paid the Real Living Wage in the financial year 2025/26. Salary payments are made directly to colleagues' bank accounts. Hightown colleagues are not forced to work in excess of legally permitted hours. Working hours and overtime only exceed 48 hours with consent from colleagues.

Agency Management

With a large portfolio of care and support services and the national challenge of recruiting and retaining staff, Hightown is reliant on recruitment agencies for the provision of temporary workers in order to maintain the required levels of service within our schemes. Agency workers are often taken on at short notice to fill gaps as required. Although we conduct due diligence on the agencies used, this still reduces our control over how these workers are sourced. To minimise Hightown's reliance on recruitment agencies, we have an internal register of Hightown 'bank employees' to provide additional shifts to our care and support schemes.

Safeguarding

To protect Hightown customers, we have safeguarding policies and procedures in place to guard them against the risks of modern slavery and/or human trafficking. We check for signs of modern slavery and human trafficking during home, or scheme visits as well as responding to any other welfare concern that our customers, their families, contractors or members of the public may have.

We have Safeguarding Lead Officers and processes in place for reporting any safeguarding issues, including suspicion of modern slavery.

Procurement

Hightown has a good understanding of its supply chains in relation to direct suppliers; we are committed to acting ethically and with integrity in our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in our supply chains. We will not support or deal with any business knowingly involved in slavery or human trafficking in any part of its operations.

We require all new suppliers to confirm this when submitting their tender or by a statement that they are not in breach of the Modern Slavery Act and have not been subject to an investigation in connection with any offence involving slavery or human trafficking. Our tender documentation includes a provision for the mandatory exclusion of any bidder convicted of an offence under sections 1, 2 or 4 of the Modern Slavery Act 2015. Hightown may instruct its agents to conduct checks of key suppliers where there are suspicions that there may be non-compliance with the legislation.

In the event that modern slavery is identified in our supply chains, suppliers will be required to take immediate, transparent action to report, investigate and implement a time-bound, corrective action plan. Where appropriate, we will work collaboratively to share lessons learned, raise awareness, and strengthen practices across the supply chains and housing sector.

Learning & Development

We take steps to ensure colleagues are aware that safeguarding is everyone's responsibility and that they have the training required to identify and report modern slavery if they suspect it.

All Hightown colleagues have access to eLearning covering Modern Slavery and Human Trafficking, with designated roles required to complete this training as mandatory. Colleagues are signposted to the Modern Slavery website www.modernslavery.co.uk and Unseen charity's resources to gain further information about types of slavery, signs to spot, online or telephone reporting and referral processes for victims.

Monitoring and Evaluation

We have utilised the Government developed Modern Slavery Assessment Tool (MSAT) for this 2025-2026 Modern Slavery risk assessment. This is the baseline audit which will inform a structured and controlled approach for a modern slavery audit for the financial year 2026/27. This will include improved communication with suppliers regarding our expectations of transparency and commitment to continuous improvement and how the MSAT insights will be used.

Hightown has introduced a short questionnaire for new suppliers to support risk prioritisation, capturing data on subcontracting, turnover and supply chain operations across different geographies. These insights enable a more targeted risk-based assessment either separately or in combination with the MSAT, as we continue to explore and enhance our due diligence approach to tackling modern slavery and human trafficking.

During 2026/27 we will continue to strive to improve our ability to identify and prevent modern slavery. We will assess our approach against the latest Transparency in Supply Chains guidance and work

towards implementing applicable improvements. We will incorporate, where appropriate, issues relating to slavery and human trafficking when we update policies and procedures.

Review

This statement is reviewed annually by the Board and is widely communicated to our stakeholders, our customers and public via our website, our Annual Report and Financial Statements 2025/26 and the Modern Slavery Statement Registry.

Qadeer Kiani

Chair of the Board

Statement Approved by the Hightown Housing Association Board on 16 July 2026