

1. Modern Slavery Statement 2025-2026

- 1.1 This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Berneslai Homes Ltd, for the financial year ended 31st March 2025. Our annual turnover exceeds the £36M threshold for this reporting.

2. Introduction

- 2.1 This statement sets out our commitment to eliminate, as far as possible, the risk of modern slavery and human trafficking taking place in our organisation and in our supply chain and the steps we have taken to ensure that slavery and human trafficking are not taking place in our organisation and in our supply chain.

3. Our Organisation

- 3.1 Berneslai Homes is an arm's length management organisation (ALMO) and wholly owned by Barnsley Metropolitan Borough Council. Berneslai Homes is a company limited by guarantee and is overseen by a Board of Directors. The implementation of policies and the day to day running of Berneslai Homes is delegated to the Chief Executive and the Executive Management Team.

4. Our Operational Scope

- 4.1 Berneslai Homes manages around 18,000 homes on behalf of tenants and Barnsley Metropolitan Borough Council.

5. Due Diligence Processes

Procurement Practices and our Supply Chain

- 5.1 Our Procurement Strategy includes reference to modern slavery and human trafficking. We require new suppliers to declare that they are not involved in slavery or human trafficking and are fully compliant with the Modern Slavery Act 2015.
- 5.2 Our central Procurement Team supports the business to provide a robust framework for procurement activities and contract management. Our team work closely across the business to ensure we comply with legislation including the Procurement Act 2023.
- 5.3 Berneslai Homes works with a wide range of different suppliers and partners, details of which are published via the contracts register on our website. Our supply chains include suppliers of building materials, Agency staff, ICT and other office equipment, professional services, office cleaning and other office facilities services. Our contractors and suppliers are predominantly UK based.

- 5.4 We have highlighted that there are some areas of our operations that are more vulnerable to modern slavery than others, particularly regarding suppliers and sub-contractors for repairs and maintenance. Our standard terms and conditions for the procurement of goods and services include Modern Slavery Act provisions, safeguarding and the legal and ethical requirements in this area. Specific procedures to mitigate the risks includes requiring subcontractors to undertake DBS checks on their staff, site cards which relates to their recruitment practices, and discussions around safeguarding. For supply of goods, we request confirmation that goods are sourced responsibly.
- 5.5 The supplier code of conduct sets out our expectations from subcontractors with regards to Modern slavery, Equality, Diversity and Inclusion and safeguarding. It also sets out how they can report any concerns to us. We continue to include our supplier and contractor code of conduct in our tender documents so that all our potential suppliers and subcontractors sign up to our commitment to reduce Modern Slavery in our supply chains.
- 5.6 We continue to use the Cabinet Office Procurement Specific Questionnaire (PSQ) to ensure that Suppliers share the right information when participating in procurement activities - Tackling Modern Slavery in Supply Chains (PPN 009).
- 5.7 During 2025/26, assurance work identified opportunities to strengthen supplier monitoring, subcontractor oversight and contract management arrangements. Actions to improve operational monitoring and verification of workers operating on behalf of Berneslai Homes will be progressed during 2026/27.

Tenants

- 5.8 We have tenancy verification checks in place for new tenancies and undertake a range of activities that may help identify potential indicators of modern slavery, human trafficking or other forms of exploitation. Through our housing and neighbourhood management and tenancy support, colleagues regularly engage with tenants and communities, providing opportunities to identify concerns and take appropriate action where required.
- 5.9 Our Tenants First team provides financial inclusion, tenancy sustainment and support services to vulnerable tenants, while Neighbourhood Officers maintain regular contact with tenants and communities across the borough. These activities help ensure that signs of vulnerability, exploitation or abuse can be identified and reported appropriately. Estate inspections and customer engagement activities also provide opportunities for employees and residents to raise concerns where they believe something may not be right.
- 5.10 Berneslai Homes operates an embedded Vulnerability Protocol, "*Something Doesn't Look Right*", which enables employees and contractors to report concerns regarding potential vulnerability, exploitation, abuse or safeguarding issues. Concerns are reviewed and referred through appropriate safeguarding

and support arrangements where required. This approach is supported by employee training and awareness activity to help colleagues recognise potential indicators of harm and understand how concerns should be escalated.

- 5.11 Safeguarding arrangements, tenancy management processes and customer-facing services form an important part of the wider control framework for identifying and responding to potential indicators of modern slavery and human trafficking within communities and tenants' homes. These arrangements sit alongside procurement, contract management and governance controls.
- 5.12 In July 2026, Board received a dedicated safeguarding policy briefing, which reinforced oversight of safeguarding responsibilities and the links between safeguarding, vulnerability and exploitation. A Board Safeguarding Champion was also appointed to provide visible leadership, and enhanced safeguarding reporting will be introduced from 2026/27 to give Board greater visibility of safeguarding activity, emerging risks and organisational responses.

6. Key policies to prevent modern slavery and human trafficking

Employees

- 6.1 Our recruitment and selection processes play a crucial role in preventing modern slavery and human trafficking by ensuring ethical and lawful employment practices. We undertake appropriate pre-employment checks, including Right to Work checks in accordance with Home Office requirements, references and Disclosure and Barring Service (DBS) checks where appropriate. These arrangements apply to permanent, temporary and agency workers and help reduce the risk of exploitation within our workforce.
- 6.2 References are obtained for all employees and include consideration of any concerns relating to working with children or vulnerable adults where relevant. Salaries are paid in accordance with recognised employment standards and Berneslai Homes remains committed to fair and lawful employment practices. Recruitment agencies used by the organisation are expected to have appropriate measures in place to prevent modern slavery and labour exploitation.
- 6.3 Employees, Board Members, contractors and tenants can raise concerns through our Whistleblowing Policy, safeguarding arrangements, line management routes and the organisation's Vulnerability Protocol. These routes provide clear ways to report wrongdoing, unethical behaviour, exploitation or wider safeguarding concerns.
- 6.4 Berneslai Homes continues to raise awareness of modern slavery and human trafficking through employee communications, safeguarding arrangements and training activity. Annual reminders cover the Modern Slavery Act 2015,

key indicators of exploitation and how concerns should be reported and escalated.

- 6.5 Assurance work in 2025/26 recognised employee awareness, training and reporting arrangements as important controls. Further actions will strengthen assurance over training completion and ongoing awareness activity during 2026/27.

Tenants

- 6.6 Our opposition to modern slavery and human trafficking is reflected in our Vulnerability Protocol, safeguarding arrangements and tenancy management processes. These provide clear routes for employees and contractors to identify and report concerns where there are indicators of exploitation, abuse or vulnerability. Concerns can be raised through our "Something Doesn't Look Right" process, safeguarding referral routes and management arrangements, ensuring that potential risks are identified and acted upon appropriately.
- 6.7 We adopt Barnsley Council's Safeguarding Children and Adult Policies and work closely with safeguarding partners to support vulnerable individuals and make referrals where required. Mandatory safeguarding e-learning is in place for employees, supported by wider awareness activity, to help colleagues recognise potential indicators of exploitation, abuse or vulnerability and understand how concerns should be reported and escalated.

Tenancy and Neighbourhood Management Policy

- 6.8 The Tenancy and Neighbourhood Management Policy supports tenants by helping employees identify early signs of vulnerability in line with the Company's vulnerability strategy and safeguarding arrangements. Key controls include:
- a) A comprehensive training programme for customer-facing officers, including '*Something Doesn't Look Right*' training, enabling staff to recognise indicators of vulnerability, exploitation and harm, and understand the appropriate action to take.
 - b) Participation in local safeguarding partnerships, boards and sub-groups to support partnership working and effective safeguarding responses.
 - c) Clear safeguarding and vulnerability reporting routes for employees and contractors to raise concerns where there are indicators of exploitation, abuse or human trafficking.

7. Assessment of Risk within our organisation

- 7.1 Berneslai Homes operates a wide range of neighbourhood and property maintenance services. Some suppliers use subcontractors or recruitment agencies to provide temporary or permanent staff and, as a result, these areas present a higher risk of modern slavery and labour exploitation. The

areas of greatest potential exposure remain repairs and maintenance activities, where supply chains and labour arrangements can be more complex.

- 7.2 Our contracts contain equality, diversity and inclusion requirements together with specific modern slavery provisions. As part of our contract management responsibilities, any concerns identified in relation to modern slavery, human trafficking or labour exploitation are investigated and may result in escalation through governance processes, remedial action or termination of a supplier contract where appropriate.
- 7.3 The 2025/26 review confirmed that control arrangements remain generally effective and that no modern slavery incidents had been identified or reported during the reporting period. It also highlighted the need to strengthen assurance arrangements, particularly around supplier monitoring, subcontractor oversight, worker verification and reducing reliance on supplier self-declarations.
- 7.4 Annually, we continue to remind staff of the requirements of the Modern Slavery Act 2015, including the definitions of slavery and human trafficking, and the indicators that may suggest exploitation is taking place. This supports our ongoing commitment to identifying and reporting potential concerns at the earliest opportunity.
- 7.5 Overall, Berneslai Homes considers the risk of modern slavery within its directly employed workforce to be low due to established employment, recruitment and safeguarding controls. The greatest potential exposure remains within parts of the supply chain and contractor network, and we will continue to take a risk-based approach to monitoring and mitigating these risks.

8. During 2026-27 we will:

- 8.1 Strengthen contract management arrangements, to improve oversight of contractors and subcontractors working on behalf of Berneslai Homes.
- 8.2 Continue to raise awareness of modern slavery and human trafficking through staff training, internal communications and safeguarding processes, ensuring colleagues understand the indicators of exploitation and how to report concerns.
- 8.3 Continue to support and promote the national [Modern Slavery Helpline](#) and awareness resources through our website and social media channels.
- 8.4 Continue to publish our Modern Slavery Statement on both the Berneslai Homes website and the Government [Modern Slavery Statement Registry](#).
- 8.5 Monitor the effectiveness of modern slavery controls through routine risk reviews, assurance activities, governance reporting, and policy and procedure

reviews as required. Any gaps or opportunities for improvement identified through these processes will be addressed through the organisation's existing improvement arrangements.

9. Effectiveness

- 9.1 The effectiveness of our policies and procedures is monitored through procurement activity, contract management, safeguarding processes, whistleblowing mechanisms and governance oversight.
- 9.2 In June 2026, the Audit & Risk Committee received a dedicated Modern Slavery Deep Dive, which reviewed the effectiveness of our controls and governance arrangements.
- 9.3 The Committee received assurance that controls are generally effective and noted that no incidents of modern slavery had been identified during the reporting period.
- 9.4 Improvement actions have been incorporated into the 2026/27 work programme, with a focus on supplier monitoring, subcontractor oversight, training completion and operational assurance.
- 9.5 We will continue to monitor the effectiveness of our arrangements and remain vigilant to the risk of modern slavery and human trafficking.

10. Declaration

- 10.1 This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Berneslai Homes' modern slavery and human trafficking statement for the financial year ending 31st March 2025, as approved by the Board on 24 September 2026.

Signed on the Board's behalf, by:

A handwritten signature in black ink, appearing to read 'Ken Taylor', is enclosed within a thin black rectangular border.

Ken Taylor
Chair of Berneslai Homes Board