

Modern Slavery and Human Trafficking Statement

Introduction

The Modern Slavery Act 2015 ('the Act') seeks to prevent the exploitation of workers and to stop human trafficking.

At Yorkshire Housing we do not tolerate any form of exploitation, and we are committed to preventing modern slavery and human trafficking in our business, communities and supply chains.

As a registered provider of social housing we operate with a strong sense of social purpose and ethical responsibility.

This statement sets out the steps Yorkshire Housing has taken to address slavery and human trafficking during the financial year 1st April 2025 to 31st March 2026. This statement applies to Yorkshire Housing and its subsidiary companies:

- Yorkshire Housing Finance PLC
- YH Residential Ltd
- Yorkshire Community Property Services (dormant, to be dissolved in 2026)

Structure of Yorkshire Housing

Yorkshire Housing is a charitable registered society under the Co-operative and Community Benefit Societies Act 2014 and a provider of social housing and related services registered with the Regulator of Social Housing.

As the biggest housing association based solely in Yorkshire, we own and manage around 20,000 homes across the region and employ approximately 950 people. Our business activity is entirely UK based. Our purpose is to make it possible for more people across Yorkshire to have a place they're proud to call home. We provide a range of housing options including affordable rent, shared ownership, and homes for sale, alongside essential services such as repairs and maintenance, money coaching, independent living support, and home adaptations. Our vision is to be the UK's best housing provider.

Policies, Training and Awareness

Yorkshire Housing has a Policy and Strategy Framework which is approved by the Board. Our policies operate in line with the principles of the Act. They are clear that no form of slavery or exploitation will be tolerated. Policies are reviewed at least every three years to make sure they continue to reflect our aims and our regulatory and statutory obligations.

Policies and procedures that address modern slavery and human trafficking are set out below:

Safeguarding

We recognise that tackling modern slavery and human trafficking is an issue of human welfare. Our Safeguarding Policy sets out clear procedures for identifying, reporting, and managing risks of harm and exploitation, including serious exploitation linked to modern slavery. The policy mandates secure systems for recording safeguarding issues, clear escalation procedures, and collaboration with external agencies to ensure timely and effective intervention. The Policy applies to all Yorkshire Housing colleagues, contractors, volunteers and apprentices.

To support this, safeguarding training for all colleagues is mandatory. This training ensures that all colleagues are equipped to recognise indicators of exploitation, including those affecting vulnerable customers, colleagues, or others we work with. The principles embedded in the training are designed to raise awareness of modern slavery risks and promote early intervention. In addition to mandatory training, an additional 15 level 2, and 6 Level 3 safeguarding sessions were delivered to colleagues.

An internal audit into safeguarding was conducted and findings presented to the Audit and Risk Committee in February 2026. The audit identified multiple areas of good practice, with some recommendations for improvements which have since been fully implemented.

A designated Safeguarding Lead provides specialist support and advice to the business where required, and safeguarding representatives are appointed across business areas to ensure consistent support and escalation of concerns.

Regular safeguarding campaigns promote further awareness with colleagues and customers.

Whistleblowing

Our Whistleblowing Policy provides a mechanism for identifying and addressing potential instances of modern slavery and human trafficking within our organisation and supply chains. The policy encourages colleagues, contractors, volunteers, and members of the public to report concerns in good faith, including those related to exploitation, abuse, or unethical conduct and ensures that all reports are investigated thoroughly and protected under whistleblower legislation. This reinforces our zero-tolerance approach and promotes transparency and accountability across our operations and supply chains.

Tenancy

Prospective customers must provide evidence of their eligibility to remain in the UK before they are offered a home, which is stipulated within our vetting procedures. This is a measure used to help ensure our tenants have not been subject to illegal trafficking. The Tenancy Policy ensures that tenancy offers are fair, transparent, and tailored to individual needs. Pre-tenancy risk assessments and sustainability checks to identify and support vulnerable customers, help to reduce the risk of exploitation. Through the involvement of tenancy and money coaches, and the provision of accessible tenancy agreements, we promote tenancy

security and independence. These measures help safeguard individuals who may be at risk of coercion or abuse, reinforcing our zero-tolerance approach to modern slavery across our housing services

Code of Conduct

We have adopted the National Housing Federation's Code of Conduct. The Code makes clear to all colleagues the behaviour that is expected from them when representing our organisation. We strive to maintain the highest standards of conduct and ethics in all aspects of our work.

In addition to the above, we also engage with third party specialist providers and our network of housing sector and local authority partners to identify up-to-date advice and guidance, and source training from subject experts, where this is available.

Procurement and Supply Chains

Yorkshire Housing is committed to ethical practices and to ensuring that our supply chains are free from modern slavery and human trafficking. We work only with suppliers and contractors who comply with the Modern Slavery Act 2015, sign up to our policies, and, where relevant, understand the needs of the vulnerable people we support.

While some of our supply chains are complex and can extend globally, we prioritise working with UK-based and local suppliers to foster close, transparent relationships. Each business area is responsible for complying with our Procurement Policy and for regularly reviewing supply chains to identify and mitigate risks.

We carry out robust due diligence on all suppliers and contractors, regardless of contract value or service type. This includes requiring confirmation of compliance with the Act during tendering and onboarding. Where unethical or high-risk practices are identified, we investigate and take appropriate action, including terminating relationships where necessary.

Our Supplier Assessment Form determines whether suppliers fall under Section 54 of the Act, assesses compliance with reporting requirements, and requests evidence of anti-exploitation measures. Suppliers with an annual turnover above £36 million must provide a copy of their Modern Slavery Statement. The form is reviewed using an Evaluation Matrix and approved by Procurement and the relevant Head of Service.

All formal tendering activities align with legal and ethical standards, including living wage requirements. We make use of established frameworks such as the Crown Commercial Service (CCS), which applies rigorous due diligence and supports government-wide efforts to tackle modern slavery. Where frameworks are not used, suppliers must complete our Supplier Assessment Form (noted above). Our contracts include audit rights, which may be exercised if a breach is suspected.

We recognise that no supply chain is entirely risk-free, but we believe our checks are proportionate and reflect both our legal obligations and moral responsibilities.

Contractors working on our behalf must sign up to our policies and confirm compliance with the Act. Bidders must do so before submitting tenders. We conduct annual reviews of framework contractors to ensure documentation remains current and relevant.

We use reputable, approved agencies to source labour and maintain preferred supplier lists. This reduces the risk of trafficked or exploited workers entering our workforce.

We have identified construction as a higher-risk sector, particularly within our development programme. All contracts must comply with our Safeguarding Policy and are supported by materials such as posters, flowcharts, and briefing notes. Site Inspectors are trained to identify safeguarding and modern slavery concerns, with reporting processes embedded in inspection documentation. These issues are also discussed at monthly site meetings.

All development sites are registered with the Considerate Constructor Scheme (CCS), an independent body that ensures right-to-work checks, training, and whistleblowing policies are in place for contractors and subcontractors.

In March 2024, we updated our Procurement Policy to align with the Procurement Act 2023. The updated policy includes strengthened commitments to modern slavery prevention, social value, and sustainability. The Act also introduces a formal debarment regime, allowing the exclusion of suppliers found guilty of offences under the Modern Slavery Act 2015, including forced labour and human trafficking.

Colleagues and other workers

We treat all our colleagues fairly and have robust measures in place to ensure this, including:

- Recruitment processes including verifying people's identity and their right to work in the UK before starting work with us.
- Monitoring rates of pay and the calculation of the legal deduction of wages,
- Paying at least the Voluntary Living Wage, or approved apprentice salaries, and providing a range of core organisational benefits.
- Offering a free 24-hour employee assistance programme to all colleagues and their immediate household that provides advice and counselling, including legal advice.
- Ensuring that colleagues take frequent breaks and are not encouraged to work in excess of the number of working hours permitted by law.
- Making salary payments directly to employees and not delaying or withholding payments without prior notification and in line with our policy.

These measures directly support efforts to eradicate modern slavery and human trafficking within our workforce and supply chains by creating a transparent, fair, and legally compliant working environment.

Effectiveness

Yorkshire Housing is committed to continuous improvement in preventing modern slavery and human trafficking. YH committed to monitoring a small set of Key Performance Indicators (KPIs) over three priority areas to help monitor the effectiveness of our approach.

- **Safeguarding** – % of colleagues completing mandatory training (reported to the Homes and Places Committee, as of 31 March 2026),

Course	No. of compliant colleagues	% percentage of compliance
Safeguarding Level 1 (e-learning)	671	96.97%
Safeguarding Level 2	208	97.65%
Safeguarding level 3	25	92.59%

- **Workforce protections** – % of new colleagues with verified right-to-work documentation

In the financial year up to 31 March 2026, 151/152 (99.34%) new starters had verified right-to-work documentation. Following internal movement, the current compliance position stands at 100%

These indicators will be monitored annually and reviewed by the Governance Team in collaboration with relevant teams. Insights will inform future improvements and help ensure our practices remain robust, proportionate, and aligned with our legal and ethical obligations.

- **Procurement** – % of suppliers assessed for compliance with the Modern Slavery Act

A sample of supplier contracts will be reviewed to test compliance with the Contract Management Framework, including the operation of existing Modern Slavery Act checks. Outcomes will be reported to the Audit and Risk Committee annually.

Approval

This statement covers the full financial year 1st April 2025 to 31st March 2026

It was approved at the Yorkshire Housing Limited Board on 9th September 2026

Signed



Ingrid Fife, Chair of the YHL Board