

Modern Slavery Policy & Statement

Jigsaw
whomes.org.uk

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1 Introduction

1. The Jigsaw Homes Group ('the Group') has a turnover in excess of £242m and employs c1,490 staff involved in the management of over 38,500 homes located in the North West and East Midlands regions of England.
2. The Group's business is primarily the provision of social housing and associated services covering the following activities;
 - Management and letting of properties
 - Development of new homes
 - Repair and maintenance of housing stock and estates
 - Revenue collection
 - Money and welfare benefit advice
 - Charitable donations to individuals and groups
 - Supporting victims of domestic abuse
 - Supporting vulnerable people from disadvantaged backgrounds.
3. Predominantly our supply chains include goods and services for the construction, repair, maintenance and management of residential properties, along with purchasing goods and services to facilitate the running of office premises.
4. Following the closing of the accounting period April 2025 to March 2026 the Group's Modern Slavery Statement is set out below. This statement has been approved by the Group's board.

2 Statement

5. The Group ensures compliance with its legal and regulatory responsibilities. The Group notes the requirements of the Modern Slavery Act 2015 (the Act) and is committed to preventing modern slavery and human trafficking activities from existing within its business or supply chain.

3 Risk Management

6. In preparing this statement the Group assessed its potential exposure to modern slavery and human trafficking. As a business, which is primarily involved in the provision of social housing and associated services, based in and operating solely within the United Kingdom we have assessed our overall exposure to the risk of slavery and human trafficking to be very low. The factors to support this assessment are set out below and during the financial year 2025-26 the Group received no reported concerns in relation to modern slavery or human trafficking.

7. The Group's approach to modern slavery is communicated to all employees, suppliers, contractors and partners at the outset of the business relationship. The prevention, detection and reporting of modern slavery or human trafficking concerns is the responsibility of all those working for the Group or under its control. Employees, suppliers contractors and partners are encouraged to raise, without fear of reprisal, concerns about suspicions of modern slavery or human trafficking in any parts of the business, or its supply chains, at the earliest opportunity.
8. The Group recognises an area of risk to be in its tenancies, where vulnerable people may be exposed to slavery and human trafficking. Our employees and contractors, particularly those involved in visiting its properties, must be aware of the potential signs of exploitation and feel empowered to utilise our concern card process.
9. Concerns raised relating to tenancies made via the concern card process are dealt with by a specialist Neighbourhood Safety Team, who will seek to safeguard those adults or children at risk of exploitation. This team also has responsibility for the investigation of unauthorised subletting and tenancy fraud.
10. The Group delivers its services through contractors who have evidenced their compliance with our expected requirements to be accepted onto our approved contractor list. A number of these approved contractors will also be subject to the requirements of Section 54 of the Act. On very rare occasions, for example when using a specialist contractor, the Group may consider awarding a contract to an organisation not on the approved contractor list. In such cases a non-compliance form is completed which will subject the potential contractor to the same rigour as those on the approved contractor list.
11. The Group recognise an area of risk could occur with the subcontracting of work. The Group seeks to mitigate this potential by having the vast majority of its grounds maintenance and cleaning services delivered by staff who are directly employed by the Group. A further control for sub-contracting is directly employed clerk of works overseeing our new build housing developments.

4 Employment Practices

12. With regards to employees, the Group
 - requires new employees to produce original document evidence of their right to work in the UK prior to the commencement of their employment.
 - pays all permanent staff, including those still within a probationary period, the national living wage.
 - uses employment agencies only by exception and when it does will only use specified, reputable employment agencies.
 - has Probity and Anti-Fraud, and Whistleblowing Policies to ensure that employees may raise concerns without fear of reprisal.
 - will provide annual training to continually seek to raise awareness and understanding of Modern Slavery.

5 Expectations of Contractors, Suppliers, Partners and Stakeholders

13. The nature of Group's work means it engages with a diverse range and size of private and public sector organisations.
14. The Group's approach to procurement is documented in its Financial Regulations. The Group is committed to ensuring that those companies that it works with adhere to the highest standards of ethics. Contractors and suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, act ethically and within the law in their use of labour and supply chains.
15. Jigsaw Homes Group will undertake due diligence when considering the appointment of a new contractor or supplier. This due diligence will include an evaluation of modern slavery and human trafficking risks, an assessment of financial stability, insurance cover arrangements and compliance with various employment policies. The Group will mandatorily exclude working with any organisation or an individual that has been convicted of an offence under the Act.
16. Where evidence of working practice comes to light which suggests non-compliance with the Act, either during the approved contractor process or whilst performing any contract, the Group will work with the contractor or supplier to address the non-compliance. It is incumbent upon the contractor or supplier to co-operate in rectifying any non-compliance within a timescale provided by the Group. Where the Group is of the opinion that either the working practices significantly contravene its expectations set out in this statement, or there has been insufficient progress being made by the contractor or supplier to address non-compliance, then it may terminate any business relationship immediately.

6 Reporting Concerns

17. The Group offer a number of ways for employees, suppliers, contractors and partners to report potential concerns regarding tenancies or working practices.
18. For concerns relating to tenancies the Group operates a concern card procedure for employees and contractors to enable the reporting of suspicions. Concerns may also be reported to the Modern Slavery Helpline on 08000 121 700, Crimestoppers on 0800 555 111, the Group Company Secretary by emailing governance@jigsawhomes.org.uk or calling the Group's dedicated Whistleblowing hotline on 0161 331 2611.
19. Concerns regarding working practices can be raised by employees with their line manager. Suppliers, contractors and partners can do this via their nominated contact within the Group, and similarly through The Modern Slavery Helpline, Crimestoppers or the Group Company Secretary as set out above.
20. It also recognised that some suppliers, contractors or partners may wish to report concerns regarding tenancies or working practices anonymously. In such circumstances the Group would signpost to these to its Whistleblowing hotline on 0161 331 2611.

7 Further Actions

21. Our aims for 2026-27 are to:
- Monitor compliance with the completion of modern slavery training by employees.
 - Raise awareness of Anti-Slavery Day scheduled for October 2026.
 - Through its Neighbourhood Safety Team, and with the use of the National Anti-Fraud Network, monitor reports of anti-social behaviour and/or tenancy fraud to identify potential safeguarding and modern slavery concerns.
22. This policy and statement will be reviewed annually by the Group and published on the Group's website and the Government modern slavery registry.

8 Relevant Policies

23. Policies supporting the delivery of this statement are:
- Safeguarding Children and Adults Policy
 - Financial Regulations
 - Terms of Reference and Scheme of Delegation
 - Recruitment and Selection Policy
 - Equality, Diversity and Inclusion Policy
 - Probity and Anti-Fraud Policy
 - Whistleblowing Policy
 - People Strategy
 - Tenancy Policy
 - Employee Handbook
 - Governance Handbook

9 Group Structure

- Jigsaw Homes Group Limited. Registered as a Community Benefit Society with FCA. Registration number: 29433R. Housing Regulator registration number: LH4345
- Jigsaw Homes North. Registered as a Community Benefit Society with FCA. Registration number: 16668R. Housing Regulator registration number: LH0131

- Jigsaw Homes Midlands. Registered as a Community Benefit Society with FCA. Registration number: 8378. Housing Regulator registration number: L4532
- Jigsaw Support. Registered as a Community Benefit Society with FCA. Registration number: 8241.
- Jigsaw Homes Tameside. -. Registered as a Community Benefit Society with FCA. Registration number: 9512 . Housing Regulator registration number: LH4266
- Cavendish Property Developments Limited. Company Number: 8166437
- Jigsaw Treasury Limited. Company Number: 12535831
- Jigsaw Funding PLC. Company Number: 13888642
- Palatine Contracts Limited. Company Number: 4056290
- Snugg Properties Limited. Company Number: 11052396

The registered office address for the above companies is Cavendish 249, Cavendish Street, Ashton-under-Lyne, OL6 7AT.

10 Document Control

Responsible Officer/s:	Group Company Secretary
Date of Approval:	17 September 2026
Recommended by:	Remuneration, Nomination and Governance Committee
Approved by:	Group Board
To be Reviewed Every:	Year

Creating homes. Building lives.

Jigsaw Homes Group Ltd.

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