

# **Progress Housing Group Ltd Modern Slavery and Human Trafficking Statement**

**Financial year ending: March 2026**

## **Introduction**

Modern slavery refers to the exploitation of individuals through coercion, threats, or deception, trapping them in conditions they cannot escape. This is illegal and a violation of human rights. Combating modern slavery involves legal reforms, law enforcement, victim support, and international cooperation.

Progress Housing Group has a zero-tolerance approach to modern slavery and is fully committed to preventing slavery and human trafficking across all our operations. The Group is dedicated to maintaining transparency and addressing modern slavery across our supply chains, in line with the Modern Slavery Act 2015.

## **Our structure**

Progress Housing Group owns and manages over 12,000 properties, including general needs, older people (independent living and Extra Care), homeowners (leaseholders and shared ownership), specialist supported housing for people with a learning disability, autistic people and those with a mental health condition, and supported housing (homelessness schemes and refuges), predominantly in Lancashire.

In addition, the Group also provides via Progress Living temporary and longer-term key worker homes, to support NHS professionals with safe, flexible, and good-quality accommodation.

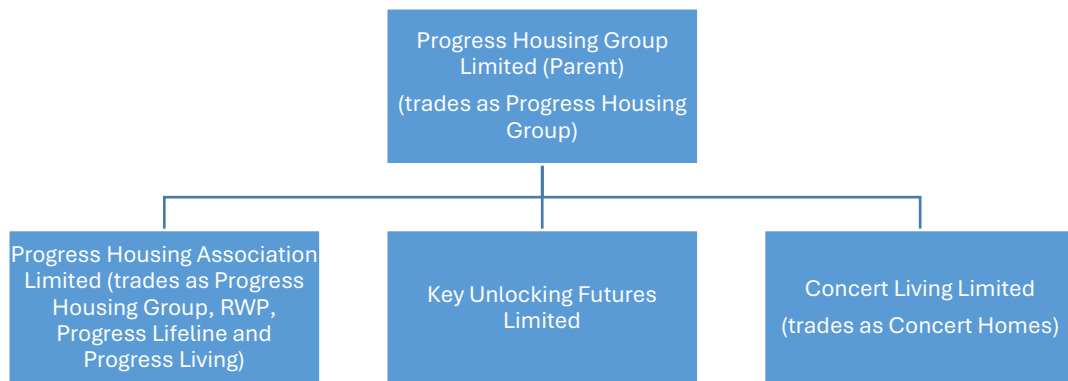
Key Unlocking Futures prevents homelessness, helps those facing domestic abuse, supports people with their health and wellbeing, strengthens communities and helps people build better lives.

Progress Lifeline helps more than 60,000 people across the country live independently at home, using technology like personal alarms and monitoring services to keep them safe and supported.

Progress Housing Group received V1 G1 compliance grading by the Regulator of Social Housing in December 2024.

The Group's vision is to ensure everyone has a place to call home and the opportunity to live their best life, and its mission is to have a positive impact on people and communities by providing high-quality homes, supporting independence and creating opportunities.

Our Group structure from March 2026 is as follows:



## Our policies

The Group is committed to conducting all business with integrity and adopts high ethical standards. The Group's key policies related to combating modern slavery include:

- Sustainable Procurement Policy
- Approved Suppliers, Contractors, and Consultant Policy
- Group Safeguarding Policy

These policies are regularly reviewed to ensure they remain effective and up to date in relation to modern slavery.

## Due diligence processes

Progress Housing Group conducts thorough due diligence across its supply chains to identify, prevent and mitigate the risk of modern slavery and human trafficking. All new suppliers, contractors and consultants are subject to pre-engagement checks to assess compliance with relevant legislation, including the Modern Slavery Act 2015.

As part of this process, suppliers are required to confirm their commitment to ethical labour practices, demonstrate appropriate policies and controls, and provide assurances that modern slavery and human trafficking are not present within their operations or supply chains. Where applicable, suppliers are asked to publish their own modern slavery statement.

The Group embeds modern slavery expectations within our procurement process, contractual terms and conditions, including the right to investigate, audit, and take appropriate remedial action where risks are identified. Ongoing supplier relationships are monitored through contract management arrangements.

Where a supplier is found to be non-compliant or unwilling to address identified risks, the Group will take appropriate action, which may include corrective action plans, suspension, or termination of the contractual relationship.

## **Our approach to managing risk**

Progress Housing Group manages the risks of modern slavery effectively; The Group's recruitment processes include right to work checks, identity verification, fair recruitment practices and adherence to employment legislation to ensure all colleagues are employed legally and ethically.

The Group provides an online training course which helps employees recognise signs of modern slavery and understand that their role in preventing it is vital for creating an informed and vigilant workforce. In-person training is offered three times per year around safeguarding, which includes modern slavery.

During 2025/2026

- 220 colleagues completed modern slavery and human trafficking e-learning
- Further colleagues attended our anti modern slavery webinar, a safeguarding training day with No Whispers CIC, which includes modern slavery and a safeguarding adults and children training day with the Ann Craft Trust, which includes modern slavery

During their first four weeks with us, new starters must complete the following mandatory training:

- Modern slavery and human trafficking e-learning
- Safeguarding Adults Level 1 e-learning
- Safeguarding Children Level 1 e-learning
- Safeguarding Adults Level 2 e-learning (if role is high-risk or customer-facing)
- Safeguarding Children Level 2 e-learning (if role is high-risk or customer-facing)

Safeguarding all tenants and customers is another crucial aspect. For example, the Group undertakes regular property inspections and has safeguarding measures in place to protect vulnerable individuals from exploitation.

The Group conducts a tenancy fraud audit, which helps to detect and prevent illegal subletting and other fraudulent activities that could mask exploitative practices.

Group employees act as customer-facing observers and are trained in spotting signs of modern slavery such as financial exploitation, unusual visitors and behaviours. Colleagues work collaboratively with support providers, police, social services, and commissioners to prevent, identify and respond to modern slavery. Risk is assessed, and plans are put in place to protect our tenants, including notifying safeguarding teams.

Through Progress Futures, the Group supports tenants to access employment, skills development and training opportunities, helping reduce vulnerabilities associated with financial hardship and potential exploitation.

Performing rigorous due diligence checks on the supply chain ensures that suppliers and contractors adhere to ethical labour standards, reducing the risk of modern slavery infiltrating business operations.

Finally, the Group has developed a robust contract management process, including clear contract clauses and monitoring mechanisms, so that the Group is able to swiftly address any identified issues.

**Activities carried out in 2025/26:**

- Promoted Anti-Slavery Day in October 2025
- Provided safeguarding training for all employees
- The Group promoted a training course on modern slavery, which is available to all employees and can be accessed at any time
- Had a campaign for Fraud Awareness Week internally for colleagues
- Were a key partner in the development of Lancashire Safeguarding Adults Board's (LSAB) new self-neglect framework and supporting toolkit, providing practical help to assist professionals
- Co-hosted awareness events in April, May, June and September 2025 for tenants and families in our communities around cuckooing, and child exploitation and county lines with No Whispers CIC and Lancashire Constabulary Cyber Crime Unit
- Partnered with No Whispers CIC to deliver training and awareness on child sexual exploitation and child criminal exploitation in our communities
- Updated our intranet Safeguarding Hub for colleagues with new information and a more efficient safeguarding referral process
- We added a section on our website to increase tenants' awareness of cuckooing, ran a social media campaign, and published an article in our independent living tenant newsletter

**Scheduled activity for 2026/27:**

- The Group will be actively involved in the promotion of Anti-Slavery Day on 18 October 2026
- The Group will make a commitment to review policies and procedures when required and update with modern slavery statements when necessary
- The Group will continue to use social media and the Group's intranet and websites to raise awareness amongst colleagues, tenants and customers
- The Group will continue to work closely with other local organisations and continue to explore options for further partnerships
- The Group will develop a comprehensive cuckooing procedure to effectively manage these challenging cases. This will include a new case management system, colleague training, and a toolkit specifically designed for officers who handle these complex situations
- A marketing campaign is being created which is aimed at increasing tenants' awareness of the signs of cuckooing and how to report it
- We will establish a monthly topical safeguarding standing news item led by our Safeguarding Working Group

## Summary

- We will continue to monitor developments in UK modern slavery legislation, statutory guidance and regulatory expectations to ensure our policies, procurement processes and reporting remain compliant and effective
- Our due diligence approach will be reviewed annually against current legal requirements, including the Modern Slavery Act 2015, emerging best practice and any updates affecting housing providers, employment practices and supply chain management
- Where legislative or regulatory changes are introduced, we will update relevant policies, training, supplier requirements and governance reporting to ensure colleagues and partners understand their responsibilities

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's Slavery and Human Trafficking Statement for the financial year ending March 2026.

This statement has been approved by the Executive Board in September 2026.

Signed



Sheena McDonnell

Chair of the board

Dated 03/09/2026

Signed



Jacqui De-Rose

Chief Executive

Dated

03/09/2026