



MODERN SLAVERY AND HUMAN TRAFFICKING 2025-26 STATEMENT

1. Introduction

- 1.1. This statement sets out Hanover (Scotland) Housing Association's (herein known as Hanover) position for the prevention of all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.
- 1.2. This statement relates to actions and activities during the financial year 1st April 2025 to 31st March 2026.
- 1.3. As part of the housing and care sector in Scotland, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.
- 1.4. Our organisation is absolutely committed to preventing slavery and human trafficking in all its activities including in our supply chain.

2. Organisational structure

- 2.1. Hanover is a Registered Social Landlord (RSL) working across 22 local authority areas in Scotland. Our core purpose is to help older people feel safe and secure at home and to live fulfilling and independent lives.
- 2.2. We provide housing and care services, mainly for older people and we currently provide more than 4,500 homes for rent throughout Scotland. Our services include affordable, rented housing, the delivery of care and support in our sheltered and very sheltered developments, the delivery of a telecare service for tenants and commercial customers.

3. Our Supply Chain

- 3.1 We do not have any direct supply chain outside of the United Kingdom. Hanover does not trade directly with any other country. Our most significant supply chain is through the delivery of materials for programmed works, day to day repairs, new build development and equipment and materials used by the Asset Management function to ensure our properties meet required standards. These materials and associated services will be properly procured, and we will ensure, as part of our procedures, that all suppliers sign up to their obligations under the Modern Slavery Act 2015 through Hanover's Modern Slavery Act (2015) Contractor Compliance Form.

4. Appointment of Contractors

- 4.1 Our contractors were appointed in line with the Scottish Government Procurement Regulations & Guidance and our Procurement Policy and Contract Management Framework. This means that before any appointment of a supplier a robust and transparent procurement process takes place. As part of the procurement process, we require notification by contractors / suppliers that they are fully compliant with the Modern Slavery Act 2015.

5. Responsibility

5.1 Responsibility for our approach to anti-slavery and human trafficking lies in the following areas:

- **Policies:** The Board (or delegated Committee) is responsible for the approval of policy documents in line with our Scheme of Delegation. Our Executive and Senior Leadership Teams (ELT/SLT) are responsible for the implementation of, and adherence to, policies.

As part of our process to roll out new and updated policies, the relevant Policy owner will be responsible for ensuring that each applicable policy includes the appropriate references to our modern slavery and human trafficking approach.

- **Risk assessments:** Reference to Modern Slavery and Human Trafficking is included in our Operational Risk Register. If, as identified through our operational risk registers, we believe there to be an increased or significant risk of non-compliance with our anti-slavery and human trafficking approach, we will then implement action plans to mitigate risks. This would be coordinated by the Procurement Team.
- **Investigations / Due diligence:** Were an investigation to be required into the possible use by a supplier or contractor of modern slaves and/or trafficked individuals, this would be coordinated by the Business Support Team and results reported to the Audit, Risk and Performance Committee.
- **Training & Awareness:** Employees were made aware of our approach through our policy rollout process. Modern Slavery & Human Trafficking awareness training was rolled out to all Hanover employees for mandatory completion.
- **Contractor Management:** Contractors supplying Hanover's Asset Management function will be required to provide a fresh signed Hanover's Modern Slavery Act (2015) Contractor Compliance Form annually. They must also flag to us any concerns they have regarding modern slavery or human trafficking.

5.2 *Due diligence*

5.2.1 We undertake due diligence when considering taking on new suppliers in line with our Contract Management Framework. We undertake regular reviews to our existing suppliers/ contractors through our Contract Management Process. This process includes:

- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans where there are any areas of concern.
- Where appropriate, we will ask suppliers to participate in collaborative initiatives focused on human rights in general, and slavery and human trafficking.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the possible termination of the business relationship.

5.2.2 Every Hanover employee has personal responsibility to flag any concerns about Modern Slavery and Human Trafficking they come across during the course of their work with their line manager or any other appropriate manager.

6. Relevant policies

- 6.1 We have revised our Policy template to include reference to Human Trafficking and Modern Slavery. Where this is a consideration, risk management and mitigating actions are required to be written into the policy and relevant procedures.
- 6.2 The following policies support our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:
- 6.3 *Corporate Procurement Policy and Plan and Supplier Management Policy*
 - 6.3.1 We are committed to ensuring that suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour.
- 6.4 *Recruitment & Agency Workers Policies and Procedures*
 - 6.4.1 Our policies set out that we use only specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from that agency.
- 6.5 *Whistleblowing Policy*
 - 6.5.1 Through this policy, we encourage all our employees, customers, stakeholders, and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- 6.6 *Health, Safety & Wellbeing Policy & Framework*
 - 6.6.1 Our Policy and Framework sets out the measures and procedures we have in place to ensure the Health Safety and Wellbeing of all our employees.
- 6.7 *Dignity at Work Policy*
 - 6.7.1 This policy sets out our belief that all employees have a right to work in an environment which is free of harassment and bullying, and where everyone is treated with dignity and respect.

7. Key Performance Indicators

- 7.1 During 2025-26 we have established KPIs which will monitor compliance with the Modern Slavery Act 2015 as follows:
 - KPI 1: % of contractors who have signed the Modern Slavery - Contractor compliance form
 - KPI 2: Number of reports on Modern Slavery Received and Upheld
 - KPI 3: % of Employees who have completed the Modern Slavery Awareness Training
- 7.3 Going forward, KPIs will be reported to the Executive, Senior and Operational Leadership Teams (ELT, SLT, OLT) quarterly, alongside analysis of the KPIs, Modern Slavery Register and detailed improvement action where required.

8. Training & Awareness

- 8.1 We require all employees to complete mandatory Modern Slavery and Human Trafficking Awareness Training which outlines:
- What Modern Slavery and Human Trafficking is
 - What to do if people suspect that Modern Slavery or Human Trafficking is taking place, either inside or outside their place of work
 - How to assess the signs and risk of modern slavery and human trafficking to Hanover
 - The process for managing any suspected instances of modern slavery and human trafficking
 - What external help is available for managing suspected instances of modern slavery and human trafficking.
- 8.2 Further information on Hanover's approach to Modern Slavery is included in relevant policies and procedures.

9. Statement Approval & Review

- 9.1 This statement was approved on 20 August 2026 by the Board and is signed off below by the Chief Executive. The Board will review and re-approve this statement annually.

CEO Name	Angela Currie
CEO Signature	
Date	20 August 2026