Your
HOUSING GROUP

MODERN SLAVERY STATEMENT

2021-2022



Creating more places for people to thrive
and be recognised as a sector leading landlord



The Modern Slavery Act 2015 (the Act) requires all organisations supplying goods or services with a turnover of above £36 million to prepare and publish an annual Modern Slavery Statement.

The Statement must set out the steps an organisation has taken, if any, during its financial year to ensure that slavery or human trafficking is not taking place in its business or supply chain. Your Housing Group (YHG) is publishing this statement setting out what it has done to recognise and prevent potential incidences of modern slavery in the Financial Year 2021-22.

YHG is aware that Section 54 the Modern Slavery Act will be strengthened as set out in the Queen's Speech 2022, including the introduction of civil penalties for organisations that do not comply with the requirements.

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Structure and vision

As a registered social housing provider, YHG prides itself on providing homes which help people live independently and enables them to get on and off the property ladder at different stages of their lives. With more than 28,000 homes across the North West, Yorkshire and Midlands, the business has a large and diverse portfolio.

We operate, through our subsidiaries, across the whole of the property chain from initial procurement of sites, through planning to the delivery and management of high quality communities across a range of tenure types and housing solutions.

We deliver services to a range of stakeholders including tenants, landlords, house buyers and local authorities.

Among the Group's key operating subsidiaries are its largest, and primary housing stock owning company, Your Housing Limited. Our development initiatives are operated through Nuvu Development Limited.

YHG is committed, as both an employer and as a landlord, to running our business responsibly. By creating more places to thrive, we will protect and enhance the communities we work for and with.



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Assessing and managing risk

As a housing organisation, our key risks lie in our supply chains, such as construction and supply of materials and in the potential vulnerability of people living in our homes. We have described these in more detail below.

Any concerns or issues in relation to Modern Slavery are recorded and monitored on the risk management system and any issues are escalated as appropriate in line with YHG's risk management framework.

Risks of a safeguarding nature are assessed through YHG's Safeguarding Operational Group which also meets to discuss our duties under the Modern Slavery Act and concerns or incidents of safeguarding, some of which could fall under the Act, and any issues are escalated if required. Modern Slavery also forms a standing item on the agenda for YHG's Equality and Diversity Steering Group, which meets on a quarterly basis.

We consider risks to the organisation and its supply chain including modern slavery across a number of channels in YHG and will escalate any concerns to the monthly Risk and Compliance Group, which has representation across the business including members of the Leadership Team. The Risk and Compliance Group will also review the modern slavery action plan.

Although the Group has not identified a specific Modern Slavery risk, we assign appropriate actions addressing any risks connected to modern slavery against via our risks relating to compliance with procurement legislation and inconsistent contract management, which we believe is appropriate to the size and scale of our operations.



Our policies and procedures

We continue to review and develop our existing policies and procedures in light of the Act in accordance with the YHG Policy Framework. We are confident that our policies promote positive behaviour among our colleagues both at work and within our supply chain – for example, case audits completed on regular basis to ensure our Safeguarding policy and procedures are adhered to.

Our policies and procedures are kept under review to make sure that they reflect the Group's evolution and our regulatory and statutory obligations. Policies are developed and reviewed in alignment with our strengthened approach to customer engagement and consultation. We have a number of relevant policies and procedures in place, all of which are subject to regular review and supported by Board and senior management, that contribute to ensuring modern slavery does not occur in our business or supply chain which include:

- **Employee Code of Conduct; Board Code of Conduct**
- **Anti-Social Behaviour and Hate Crime Policy**
- **Probity Policy**
- **Equality, Diversity and Inclusion Policy**
- **Anti-Fraud, Anti-Money Laundering and Fraud Risk Management Policy**
- **Health, Safety and Wellbeing Policy**
- **Whistleblowing Policy**
- **Domestic Abuse and Safeguarding Policies**
- **Operational Standing Orders**
- **YHG Procurement Procedures**
- **Disciplinary Procedure**
- **Recruitment and Selection Procedure**
- **Grievance Procedure**

Our YHG Procurement Procedure, Procurement Team Guidance and Contract Management Procedures provide enhanced governance around tendering and supplier selection and strengthen due diligence in the supply chain in relation to Modern Slavery into our processes and procedures. The Guidance and any associated procedures are updated regularly, with the most recent update taking place during May 2022.



Due diligence

We aim to ensure that our supplier due diligence procedures are appropriate to our modern slavery risk and the level of influence the Group has.

An important element of these are the Procurement Procedure, Procurement Team Guidance and Contract Management Procedures, as previously mentioned.

We use the standard Selection Questionnaire for supplier due diligence including questions on compliance with the Modern Slavery Act, and review of suppliers' modern slavery statements or policies/procedures. We will tailor these questions where appropriate to the commodity being purchased based on its risk level.

We also developed an on-site checklist for our contract managers to use, ensuring all staff are vigilant for signs of modern slavery on sites or when dealing with suppliers.



Training

We have discussed the Act at our Risk and Compliance Group to understand our duties and our Board has reviewed the annual statement and provided oversight to our approach.

At our Safeguarding Operational Group we have discussed our duties under the Modern Slavery Act and explained the definition of modern slavery to staff.

We believe training is crucial to address the risk of modern slavery and human trafficking occurring in our properties and supply chains and to ensure a high level of understanding of the risks, we have provided training to through our tiered Safeguarding Training Courses. The training was reviewed and updated during 2020/2021 to ensure that it remains relevant and reflects existing best practice and is due for renewal in 2022/2023. Level 1 online safeguarding training is mandatory for all employees and further levels are undertaken by relevant members of staff, typically "front line" staff working in our communities.

Our modern slavery training is mandatory for all frontline staff who require Level 2 safeguarding training, as well as for other staff whose work may have an impact on helping to identify, tackle and prevent modern slavery such as those working in procurement, finance and governance. Safeguarding training compliance is monitored at the Risk and Compliance Group and the Safeguarding Operational Group.

In 2022 we carried out contract management training across the Group for relevant staff who are involved in managing suppliers and contracts. This included a specific section on modern slavery awareness and signs to complement our other training courses available.

YHG procurement staff have all completed the CIPS accredited **Modern Slavery Certificate** during 2021 to further increase awareness of modern slavery issues, and we will refresh this training on an annual basis.

To further support learning, we have a regularly updated Safeguarding Hub on the intranet which has a dedicated section to increase awareness and understanding of modern slavery. This reflects the more modern way in which people learn and supports our training. The statement will be highlighted to all relevant colleagues through our **Safeguarding Policy** and the **Modern Slavery** and **Human Trafficking training**.



Supply chains

YHG has its own Procurement Team, consisting of five full time members of staff who provide procurement, sourcing and supply chain expertise to the business following the Procurement Team Procedures that are embedded across YHG.

YHG reviews its suppliers annually and during 2021/22 had 710 suppliers, who are used to deliver a range of goods, works and services across the Group.

The Procurement Team has set procedures for the assessment and due diligence of suppliers to address the supply chain risk. This includes use of the standard Selection Questionnaire or eligibility questions including specific questions on Modern Slavery which asks all bidders to demonstrate that they comply with the Act. These questions are tailored to the risk level of the commodity being purchased with enhanced checks for those suppliers in higher risk sectors such as construction. Our standards are all fully compliant with all legislation relating to public procurement, including those around Modern Slavery.

All our standard contracts contain clauses and contractual requirements that our suppliers do not engage in any activity that is contrary to the Act. As contracts are renewed or retendered, the Procurement Team ensure that any relevant terms and conditions are included within any new agreements. The Procurement Team maintain a register of all contracts and approve all new suppliers to the business ensuring that they meet our eligibility criteria including Modern Slavery. YHG has also developed its own modern slavery checklist for all staff to use with suppliers at site visits as part of the evidence process.

Our suppliers have been mapped to identify those who carry the greatest risk to our business which incorporates modern slavery as a risk. The goods, works and services that YHG typically purchases tend to be from industries that are highly regulated such as law, asset safety, compliance and are therefore of a lower risk for modern slavery. However, YHG continues to enhance the assurances we seek from supply chain members as to their avoidance of modern slavery and human trafficking. For those suppliers YHG uses in higher risk supply chains, such as construction and supply of materials, where the supply chain may be longer and include the use of temporary or agency workers, YHG conducts additional checks such as site visits using our checklist or at tender stage.



Recruitment

We are not exposed to a high risk of recruiting staff who may have been subject to human trafficking, however our recruitment and selection process contains relevant requirements in terms of checking of eligibility to work in the UK and carrying out the necessary checks such as DBS (Disclosure and Barring Service).

For every successful application, we check proof of eligibility to work in the UK; this initially is by way of a question upon application and then verification of relevant documentation before/after interview. This is by production of a valid passport, or via other means such as a full birth certificate with proof also of National Insurance Number.

For roles that require DBS clearance; each relevant role clearly states the requirement for DBS and the level of DBS associated with that role and the relevant DBS is undertaken for all offered candidates where it is a role requirement.

References are also taken for every potential new starter covering two years full career history and a minimum of two references – if there are any gaps in employment greater than one month we will discuss with the candidate and for a safer recruitment role we will investigate, clarify the gap and seek a character reference.

All pre-employment checks including the Right to Work in UK, qualification checks, interview notes, evidence of recruitment and budget approval have to be received and signed off prior to an employment start date being agreed.



Our on-going commitment to the Modern Slavery Act 2015

We are committed to ensuring as far as possible that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our commitment is to act ethically and with integrity in all our business relationships and to implement effective systems and controls to ensure slavery and human trafficking is not taking place. We are further committed to making sure that our properties are not used to accommodate the work of human traffickers or detain others for servitude and work with a range of agencies, including the police and local authorities to ensure that information is shared, and action is taken if necessary.

In support of this, a Modern Slavery Action Plan, based on Guidance issued by the Home Office, has been reviewed and approved to include actions further aimed at combatting Modern Slavery in any part of our business or in our supply chain.
The plan is on track with actions achieved and progress reported to the appropriate body. Further actions for 2022/23 are also planned to enhance our commitment as well as continuing to embed current activity to ensure that addressing issues of modern slavery is business as usual.

This includes working towards attaining the Domestic Abuse Housing Alliance Accreditation, completing supply chain questionnaires with key suppliers, and conducting a third round of Customer Connect visits to help identify any potential concerns.

The response to the Covid-19 pandemic, such as government-mandated lockdowns, limited opportunities to identify and support people affected by modern slavery. The impact of the pandemic remains, with a role for front facing staff and contractors still to play in addressing the risks to customers. YHG's responsive senior management group remains in place to address future scenarios of this kind.

Public procurement is highly regulated and YHG is subject to the rules and due diligence around this. All suppliers been through rigorous process and we follow up on this through monitoring and using market intelligence. All our procurement activity is governed by these regulations.

Oversight of the Modern Slavery agenda is monitored through the Equality and Diversity and Risk and Compliance Groups and any issues escalated to the Group Board. Risk and Compliance Group and Group Board are also responsible for approving the Action Plan and Annual Statement.

Declaration

This statement has been approved by the Group Board of Directors and is made pursuant to section 54(1) of the Modern Slavery Act 2015.

Signed

Clare Oakley

Director of Governance and Risk, including Group Company Secretary

28 July 2022