Modern Slavery Act - Shelter's Statement

Modern slavery statement for the year ended 31 March 2024

Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015. Shelter is committed to acting ethically and with integrity and transparency in all professional dealings, and to having effective systems, processes and controls in place to safeguard against any form of modern slavery taking place within Shelter or our supply chain.

Shelter's structure

Shelter, the National Campaign for Homeless People limited is a charity who's purpose is to provide free advice, support and legal services to people facing homelessness and bad housing across both England and Scotland and campaign to achieve systemic changes needed to end homelessness and bad housing.

Our expert advice and services are accessible via our website, emergency helpline and face-to-face centres throughout England and Scotland. This, in turn, informs our campaigning for new laws, policies, and solutions. Tackling the root causes of bad housing means people can find and keep a home in a place where they can thrive

The organisation also engages in income generating activities to fund the delivery of the charity's purpose and charitable objectives. Shelters income comes through diverse sources such as charity retail, fundraising activity and contract and grant income. Shelter appropriately manages both restricted and unrestricted income.

Our policies and procedures are designed to ensure that ethical behaviour forms the basis of our ways of working. We ensure all staff and volunteers are trained in Safeguarding which includes being aware of what modern slavery is and how it can happen. We will continue our programme to update all relevant policies to include appropriate references to the risk of modern slavery. We also operate numerous risk controls to protect staff and clients' personal information, and to ensure that our systems and services are not used to perpetrate or facilitate crime, including modern slavery.

We recognise that homelessness and modern slavery are often interlinked. People experiencing homelessness are extremely vulnerable to modern slavery, with criminals targeting them for exploitation. In fact, research by Project TILI - 'Train, Identify, Learn, Intelligence – a two year project gathering evidence to understand the links between homelessness and modern slavery - found the most common living situations before a person was exploited in England, Wales or Northern Ireland were rough sleeping and sofa surfing. Through Shelter combatting the housing crisis, we hope to have an impact on modern slavery.

We have c 1265 staff and benefit from the time and dedication of over 2100 volunteers (We have circa 1,800 regular volunteers with an additional approximately 300 volunteers from our corporate partners across a year). The vast majority of our staff are employed directly by Shelter, and are not of an employment status generally considered to be vulnerable to modern slavery. The organisation carries out appropriate pre-employment checks prior to commencement and staff complete mandatory training to ensure they understand and comply with our values and policies. Appropriate references to modern slavery are incorporated into relevant aspects of our recruitment processes and training. Our staff earn at least the Living Wage Foundation Rate.

Shelter supply chain

The charity uses a wide range of suppliers for our operations across England and Scotland who supply goods and services that support the operations of the charity. The charity recognises the importance of its role in implementing the guidance of the Modern Slavery Act and its implications.

Those involved in procurement are aware of the risk of modern slavery specifically, and our Procurement Policy sets out requirements for buying goods and services and due diligence required on suppliers. Our Whistleblowing Policy and procedure encourages staff to report any concerns.

The supplier code of conduct references the risk of the Modern Slavery Act in our supply chain. The Procurement Policy and code of conduct will be used to further draw the attention of the charity's staff and volunteers to the risks relating to modern slavery and child and forced labour, ensuring that they have access to the necessary information and most importantly how they can report any concerns they have.

Policies

Shelter staff and volunteers have access via our intranet to the following policies:

- Recruitment
- Safeguarding
- Whistleblowing
- Procurement Policy & Code of Conduct

Through these policies and the measures below we prevent modern slavery occurring at Shelter or in our supply chains:

- All staff have undertaken mandatory training in Safeguarding which covers modern slavery;
- Staff are aware of how to report incidents of concern and are encouraged to do so. They can do this through their managers or through the Whistleblowing procedure;
- Safeguarding incidents are reported to the Safeguarding panel and these include any incidents of modern slavery;
- An appropriate procurement process is in place to satisfy ourselves all suppliers meet our policies and procedures and contractual clauses are in place that reflect modern slavery; and
- Pre-employment checking.

Future activities

In response to the introduction of the Modern Slavery Act 2015, Shelter has reviewed its internal policies and procedures, and intends to introduce the following initiatives during the financial year 1 April 2023 to 31 March 2024:

- Shelter will increase partnership working and learning from specialist agencies by
    - Participating in initiatives at a local level to help identify and take action to prevent modern slavery and human trafficking.
    - Regularly sharing and promoting good practice guidance from specialist agencies to improve staff expertise and raise awareness.
    - Keeping policy up to date with best practice and supporting service development in this area.
- Continue to expand its due diligence of suppliers and ongoing review of supplier terms and conditions to ensure these are consistent with the Modern Slavery Act.
- Ensure all relevant suppliers are signed up to Shelter's Supplier Code of Conduct.

Approval

This statement will be reviewed annually and is approved by Shelter's Executive Leadership Team who has responsibility for ensuring its implementation.