Modern slavery statement for the year ending 31 March 2025

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 which provides 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. Shelter's 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 employees 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 employees and clients' personal information and to ensure that our systems and services are not used to perpetuate 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 1257 employees and benefit from the time and dedication of 2100 volunteers and an additional 500 volunteers from our corporate partners across a year. The vast majority of our employees 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 employees 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 employees earn at least the Living Wage Foundation Rate.

Shelter's 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 the due diligence required on suppliers. Our whistleblowing policy and procedure encourages employees 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 employees 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 employees and volunteers have access to the following policies:

- recruitment
- safeguarding
- whistleblowing
- procurement policy and code of conduct

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

- employees and volunteers are inducted into our safeguarding policies (for both Shelter and Shelter Scotland) which are reviewed annually at a minimum
- we ensure employees and volunteers are trained in safeguarding, which includes being aware of what modern slavery is and how it can happen. Employees and volunteers are required to complete mandatory safeguarding eLearning as part of their induction, this training is refreshed at a minimum of every three years. In addition to this, Shelter Services and Shelter Scotland Services employees attend a mandatory safeguarding webinar
- Shelter has a dedicated safeguarding inbox managed by the Safeguarding Manager; employees can use this inbox to ask for advice on safeguarding matters. Complex safeguarding concerns can also be discussed during quarterly operational and strategic meetings. The Safeguarding Manager compiles an annual register of all safeguarding cases, including any incidents of modern slavery which are reviewed by the Safeguarding Panel and presented to the Board of Trustees
- employees 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
- an appropriate procurement process is in place to satisfy ourselves that all suppliers meet our policies and procedures, and contractual clauses are in place that reflect modern slavery
- 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 maintain and introduce the following initiatives during the financial year 1 April 2024 to 31 March 2025:

- Shelter will continue to 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 employees' expertise and raise awareness
    - keeping policy up to date with best practices 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.