Modern slavery statement for the year ending 31 March 2027

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 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 campaigns to achieve changes needed to end homelessness and bad housing for good.

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, volunteers, 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. 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 combatting the housing emergency, we hope to have an impact on modern slavery.

We have c 1200 employees and benefit from the time and dedication of 1600 volunteers and an additional 1100 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 and WWNT policies and procedures encourage employees to report any concerns.

Shelter has identified higher risk procurement categories including retail merchandise, facilities management services and outsourced cleaning services, where labour exploitation risks may be greater.

The supplier Code of Conduct and associated minimum goods standards reference the risk of Modern Slavery in our supply chain. Suppliers are required to complete a supplier standards questionnaire to attest to and evidence their compliance to our standards. The questionnaire requires our suppliers to confirm they comply with the International Labour Organisation core conventions and take steps to ensure they don't profit from any form of modern slavery.

The Procurement Policy, supplier code of conduct and minimum goods standards published on our website (www.shelter.org.uk/suppliers), are used to further draw the attention of the charity's employees, volunteers and suppliers 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 Supplier code of conduct
- WWNT (We Will Not Tolerate)
- Internal and external (client) Domestic Abuse

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 and/or the WWNT 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 reflects modern slavery

- pre-employment checking:

    - Verification of documentation which proves the right to work in the UK before employment commences. If subject to immigration control, this will include evidencing the permission to work in the UK as conferred by UK Visas and Immigration.
    - Shelter receiving references which it regards as satisfactory.
    - In roles working directly with the public, or closely with vulnerable groups, basic/enhanced DBS checks are completed and come back clear. In Scotland, Disclosure Scotland require PVG checks to be completed before work begins.

- Should a potential victim of Modern Slavery / Forced Labour / Human Trafficking be identified, Shelter's first priority would be the safety and wellbeing of the individual(s) involved and the response would be developed based on the context. For example:
    - Colleague - whether staff, volunteers, or contractor our first step would be a safeguarding plan, and support for the individual to access necessary services safely. If appropriate a safeguarding alert would be raised with the relevant Local Authority, as well as to the Modern Slavery Helpline.
    - Supply Chain- if Modern Slavery / Forced Labour / Human Trafficking is identified within Shelter's supply chain, Shelter's approach would be victim centred, working to protect the victims, and with suppliers to quickly remediate the situation. Appropriate referrals would be made to the Modern Slavery Helpline; Gangmasters and Labour Abuse Authority; Police; or other organisations as appropriate.

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 2026 to 31 March 2027:

- 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

    Implementation responsibility: collectively by the Safeguarding team, and Services across England and Scotland.

- 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.

Implementation responsibility: Procurement team

- ensure all relevant suppliers confirm adherence to Shelter's Supplier Code of Conduct

    Implementation responsibility: Procurement team and Learning

- regularly review and develop our minimum goods standards

    Implementation responsibility: Procurement team

Approval

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