

# Yorkshire Housing Limited

## Modern Slavery Statement

#### Introduction

The Modern Slavery Act 2015 ('the Act') seeks to prevent the exploitation of workers and to stop human trafficking. This statement sets out the steps Yorkshire Housing has taken to prevent slavery and human trafficking within the organisation and its supply chains.

At Yorkshire Housing we do not tolerate any form of exploitation. A key part of this is seeking to ensure all businesses in our supply chains comply with principles in the Act. It is a topic closely aligned with our core "Respect" value, one of our three overarching values, and our belief that everyone deserves to be treated fairly.

#### Structure of Yorkshire Housing

Yorkshire Housing provides more than 18,000 homes across the Yorkshire region. The majority of our homes are for rent. We operate a facilities management service to homes on the Swarcliffe estate in Leeds under a PFI contract.

As disclosed in our financial statements we aim to develop more than 1300 new homes across a range of tenures over the next three years. We invest over £20m a year in repairs and improvements to our existing homes. Our market rent and shared ownership business is managed by a wholly-owned subsidiary, YH Residential Limited.

In addition to our main business we also provide housing with support including independent living housing for older people and housing and day services for people with learning difficulties, Home Improvement Agency work and act as Help to Buy agent in Yorkshire and the North East.

## Policies and Training

Our Human Resources policies, where relevant, operate in line with the principles of the Modern Slavery Act. The policies make it clear no form of slavery or exploitation will be tolerated. Our procurement policy is due for review in late 2016 and we will take this opportunity to ensure it is explicitly aligned with the principles in the Act.

Identifying and preventing slavery and human trafficking is mainly an issue of human welfare. Our new safeguarding training has been developed to ensure workers at Yorkshire Housing have good awareness of situations which suggest vulnerable customers may be being exploited. This training includes raising awareness around the prevention of exploitation through modern slavery and human trafficking. These principles can equally be applied to similar exploitation of colleagues and others.

Any members of staff may report concerns about modern slavery using our internal safeguarding reporting system, alternatively reports may be made using our long-established whistleblowing policy.

In addition to the above, all prospective tenants must provide evidence of their eligibility to remain in the UK before they are offered a home. This is a measure used to help ensure our tenants have not been subject to illegal trafficking.

### **Supply Chains**

The supply chains of some parts of our business are complicated. Each area of our business was asked to consider its supply chain to decide if there are any types of supplier that represent an increased level of risk of modern slavery. This was supported centrally by our Governance Team and these assessments are being used to inform our approach to managing our responsibilities under the Modern Slavery Act.

Through this process, as well as working with others in the sector, we identified the use of small sub-contractors (e.g. cleaning workers), construction and the use of agency staff as representing higher levels of risk.

We manage a framework of contractors who must sign up to Yorkshire Housing's policies to work on our behalf. All new contractors are required to confirm they comply with our policies. Existing contractors are asked to make the same confirmation when they complete their periodic renewal to be on the framework. These confirmations give us some confidence in our supply chain but it is recognised that this does not completely mitigate the risk, especially of long supply chains where we have no right to audit.

Our business also uses a number of agency staff, in particular for care and support services. This is traditionally an area that relies upon (legal) migrant workers and so represents an increased level of risk. We have changed our arrangements for recruiting agency staff so they are all now sourced from one provider. The provider has issued a Board approved statement of how it prevents slavery and human trafficking, which includes "strict compliance checks...for all temporary workers we supply". This change has reduced the possibility of trafficked workers being used within Yorkshire Housing.

#### Effectiveness

Our approved contractor framework is monitored on a regular basis to ensure contractors comply with our policies and procedures. This monitoring process is being enhanced to include checks to explicitly ensure compliance with our policy terms on modern slavery and human trafficking.

We are continually looking to improve our processes and review our approach to modern slavery and human trafficking on an on-going basis.

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Mervyn Jones, Chief Executive 28 September 2016