

Title:	Modern Slavery Statement
Person responsible:	Director of Housing & Insight
Customer consultation arrangement:	N/A
EIA required:	Yes
EIA completed (date):	September 2024
Approved by:	Board
Business Strategy Theme	Quality Services, Quality People
Approval date:	September 2024
Links to other key policies:	Procurement & Contract Management Strategy and Functional Instruction Manual Code of Conduct Policy Anti-Fraud, Bribery and Corruption Policy Recruitment and Selection Policy Health, Safety & Welfare Framework Whistleblowing Policy Equality, Diversity and Inclusion Policy Safeguarding Children and Vulnerable Adults at Risk Policy Anti-Social Behaviour and Domestic Abuse Policies
Review date:	April 2027

Document management		
Version	Date amended	Amendments
1	September 2024	New
2	July 2026	Updated following Restructure, Changes to Job Role Titles and Responsibilities.

1. Introduction

- 1.1 South Lakes Housing (SLH) is committed to improving our practices to combat slavery and human trafficking. In this Statement, slavery and human trafficking are referred to as modern slavery. We have a zero-tolerance approach to corruption, bribery, and modern slavery.
- 1.2 Although, based on turnover, we are not required to publish a statement, this Statement reflects our commitment to act ethically, with integrity and to comply with the principles of the Modern Slavery Act 2015.

2. Our Structure and Purpose

- 2.1 SLH is a Registered Provider (housing association), and we own and manage approximately 3500 homes across a wide geography in South Lakeland and Lancashire. South Lakes Housing is a Registered Society under the Co-operative and Community Benefit Societies Act 2014 with the number 31419R and regulated by the Regulator of Social Housing. Our vision is 'Quality homes, Quality Services, Quality People.
- 2.2 We operate on the basis that safeguarding is everyone's responsibility and have a policy and processes in place so that appropriate action is taken when concerns are raised. Safeguarding training is mandatory for all colleagues.

3. Expectations of our Suppliers and Our Supply Chains

- 3.1 Our procurement activities take place in England, and our contractors, consultants and suppliers are predominantly UK-based. We expect our contractors, consultants, and suppliers to share our values on modern slavery and carry out their own due diligence on their own supply chains to limit the risk of modern slavery taking place. We will not engage with any business knowingly involved in slavery or human trafficking.

4. Our Customers

- 4.1 We have a role to play, along with other agencies, to keep our customers and those who live with them safe so they may live free from abuse. Some of the people we house are vulnerable to modern slavery, particularly those living alone, due to protected characteristics and wider socio-economic factors. This form of modern slavery may include financial control and abuse, cuckooing and forced criminality. When asked, we would support the Police and multi-agency partnerships to assist victims, by improving security or providing rehousing and taking appropriate action if our customers, contractors/suppliers or colleagues were found guilty of involvement.

5. Our Policies on Slavery and Human Trafficking

- 5.1 We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We have a number of policies and procedures in place that contribute to ensuring modern slavery does not occur in our business or supply chain, which include our:
- Procurement & Contract Management Strategy
 - Code of Conduct Policy
 - Anti-Fraud, Bribery and Corruption Policy
 - Safeguarding Children and Vulnerable Adults at Risk Policy
 - Recruitment and Selection Policy
 - Whistleblowing Policy
 - Equality, Diversity, and Inclusion Policy

- Domestic Abuse Policy
- Environmental, Social and Governance (ESG) reporting

6. Due Diligence Process for Slavery and Human Trafficking

- 6.1 Our Procurement & Contract Management Strategy and Functional Instruction Manual sets out how we approach purchasing goods and services. As part of our procurement procedures, where appropriate, we ask contractors, consultants, and suppliers for copies of their Modern Slavery and Human Trafficking Statements setting out how the bidder has taken steps to ensure that slavery and human trafficking are not taking place in any part of the business or supply chains. We will raise awareness of this statement by circulating it to all colleagues, our key suppliers, and contractors and publishing it on our website.

7. Risk Assessment and Management

- 7.1 We are based in the UK and believe the risk of modern slavery and human trafficking in our business is relatively low. There are a number of ways we assess and manage the risk of modern slavery in our operations. We have policies and processes in place to minimise the risk of modern slavery among colleagues we employ directly, including carrying out right to work checks, and we pay the Living Wage. We promote our Whistleblowing Policy for colleagues to report any concerns.
- 7.2 Some of our suppliers and contractors are more vulnerable to modern slavery than others, for example, repairs and maintenance, cleaning, and grounds maintenance. We carry out due diligence checks, where appropriate, when appointing suppliers, contractors, and consultants.

8. Supplier Adherence to our Values and Ethics

- 8.1 We have a zero-tolerance approach to slavery and human trafficking. We will share our statement with our contractors and suppliers and ask that they abide by the principles of the Modern Slavery Act 2015 and commit to ensuring that modern slavery is not taking place in their own supply chains. We also propose to incorporate new contractual clauses within our standard contract conditions for contractors and suppliers, which will make clear our requirement that they comply with the principles of the Modern Slavery Act 2015 and will also allow us to terminate the contract if there is a modern slavery or human trafficking breach by a supplier.

9. Reporting Concerns

- 9.1 SLH expect any colleagues, contractors and suppliers working on our behalf to raise any concerns or suspicions of incidents of modern slavery or human trafficking in line with our Safeguarding Policy and procedures. We will

investigate and act promptly if we become aware of any incidents or allegations of modern slavery and provide feedback on any lessons learned.

- 9.2 In the event of a serious concern requiring an emergency response, colleagues, contractors, and suppliers should contact the Police direct by calling 999. They may also contact the Modern Slavery Helpline on 08000 121700.

10. Ongoing commitment to the Modern Slavery Act 2015

- 10.1 We are committed to ensuring 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 will investigate any suspicions or allegations.

11. Monitoring Effectiveness

- 11.1 The pre-qualification criteria for suppliers will have a requirement to have measures in place to minimise the possibility of modern slavery in their business and supply chain.

12. Training

- 12.1 To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide training for our colleagues.

13. Monitoring and Review

- 13.1 This statement will be reviewed every three years, where there have been significant changes to regulation, legislation, operations or best practice to warrant a further policy review.
- 13.2 If you have any questions about this statement, please contact SLH via email, customerservices@southlakeshousing.co.uk