

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's business activity is entirely UK based.

We own or deliver housing related services to 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.

We aim to develop more than 3,000 new homes across a range of tenures in the three years up to 2020. 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, Home Improvement Agency work and act as Help to Buy agent in Yorkshire and the North East.

Policies, Training and Awareness

Our Human Resources policies operate in line with the principles of the Act. The policies make it clear no form of slavery or exploitation will be tolerated. Our procurement policy is explicitly aligned with the principles in the Act.

Identifying and preventing slavery and human trafficking is mainly an issue of human welfare. Safeguarding training has been further developed in the year to ensure workers at Yorkshire Housing have good awareness of situations which suggest vulnerable people 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. The training is mandatory for all workers and forms part of our Job Essential Learning process.

To further raise awareness of Modern Slavery and the role staff and tenants can play in identifying and preventing it, we have developed a communications strategy. This centres around anti-slavery day but operates throughout the year.

Any member 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.

We also engage with third parties to identify sector or functional-specific advice and guidance, sourcing training from subject experts where this is available.

Supply Chains – Risk Assessment and Due Diligence

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 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), and the use of agency staff as representing higher levels of risk. We have also identified construction as a sector which represents a higher risk, especially with our development programme. Some of our suppliers have overseas supply chains. We are committed to only working with organisations who can demonstrate that they comply with the Act and embody the principles of protecting individuals' rights.

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 and attest to compliance with Modern Slavery law. Anyone bidding for work must confirm that they comply with the Act before submitting a bid. 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 uses a number of agency staff. We have a managed service provider for agency workers who manage the supply of workers to us. This provider has issued a statement of how they prevent slavery and human trafficking when sourcing temporary staff. We believe this reduces the possibility of trafficked workers being used within Yorkshire Housing. We currently use three other agencies to provide highly skilled contractors. These contractors have been assessed as representing a lower level of risk.

Effectiveness

We are continually looking to improve our processes and review our approach to modern slavery and human trafficking on an on-going basis. A working group is in place and meets to discuss, agree and undertake actions to enhance our processes to further mitigate modern slavery risks.

Will Lifford– Chair of Board – 24 July 2019

Approval

This statement covers the full financial year 1 April 2018 to 31 March 2019. It was approved at the Yorkshire Housing Limited Board meeting on 24 July 2019. Will Lifford, Chair of the Board, personally signed the statement at that meeting.