



Anti-Slavery and Human Trafficking Statement 2025/26

Introduction

Modern slavery is a crime and violation of fundamental human rights. It includes recruitment, movement, harbouring, or receiving of humans using force, coercion, abuse of vulnerability, deception, or other means for the purpose of exploitation.

Human trafficking is the trade of humans for the purpose of forced labour, sexual slavery, or commercial sexual exploitation.

We recognise the damaging impact of modern slavery and human trafficking on global society. As an organisation we are committed to acting ethically and with integrity in all our operations and relationships, taking a zero-tolerance approach to modern slavery and human trafficking. This is the second statement for Southern Housing as a merged organisation. This statement highlights:

- The actions we continue to take to combat modern slavery
- Progress made during the financial year 2024-25
- What we plan to focus on in 2025-26.

We identified a small but significant number of cases of modern slavery in our operations during 2024/2025. The cases were found to be examples of 'cuckooing' and 'county lines'. In each case we followed our Safeguarding Procedure and took appropriate action.

Business structure and operations

Southern Housing is one of the largest housing providers in the UK, formed in December 2022. The Company structure comprises a number of subsidiaries and joint ventures. All colleagues are employed by the parent organisation (Southern Housing). We offer a range of services, including social housing, shared ownership, affordable rent, private market rent, student accommodation, care and support, and outright sales.

Our vision is to create communities where everyone has a safe home in a place they're proud to live. We own around 77,000 homes and serve 167,000 residents across London, the south-east, the Midlands, and the Isle of Wight. We employ around 2500 people.

As part of this commitment, we have formed a multi-disciplinary **Modern Slavery Working Group (MSWG)**. The group works collaboratively across the organisation and in partnership with stakeholders and residents, including our Board Equality, Diversity & Inclusion Champion. The working group provides oversight and contributes to continuous

learning, monitoring, evaluation, and scrutiny of our policies and organisational practices to ensure we comply with all relevant legislation.

Our Board and Chief Executive are responsible for:

- Overseeing our modern slavery and human trafficking approach
- Risk management
- Approving our Anti-Slavery and Human Trafficking Statement and [Policy](#).

Our Executive Director of People and Culture:

- Is responsible for implementation of our modern slavery approach
- Owns the statement and budget.

Due diligence

We achieve this through our due diligence processes by:

- Publishing our annual Anti-Slavery and Human Trafficking Statement
- Having in place contract management framework to ensure we only engage with suppliers and contractors who publish modern slavery statements and confirm their compliance with the [Modern Slavery Act 2015](#)
- Being aware of high-risk areas of our business where we might encounter slavery and human trafficking and ensure the contracts have clauses and suppliers comply with legislation activities linked to housebuilding, property maintenance, estate services, care and support, IT, and temporary staff
- Ensuring our contracts contain modern slavery specifications to reduce the risk of it occurring in our supply chains
- Incorporating modern slavery and human trafficking in our risk management framework
- Raising awareness and providing learning opportunities to ensure colleagues develop clear understanding of what modern slavery is, what it looks like, and how to prevent it from occurring in our business and supply chains
- Reviewing and applying our policies and practices such as recruitment, procurement, safeguarding, pre-employment and code of conduct as well as our [Anti-Slavery and Human Trafficking Policy](#) and [Reasonable Adjustments & Vulnerable Needs Policy](#).

Policy framework and compliance

The [Modern Slavery Act 2015](#) requires organisations operating in the UK to commit to tackling slavery and human trafficking. Southern Housing is legally required, under section 54 - *transparency in supply chain*, to publish an annual statement detailing our progress in preventing modern slavery in our business and supply chain.

We have developed our [Anti-Slavery and Human Trafficking Policy](#) which outlines our approach to tackling and preventing modern slavery in our business and supply chain. While not a legal requirement, this is our further commitment towards tackling modern slavery. The Policy sets out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking.

Our [Anti-Slavery and Human Trafficking Policy](#) is supported by other related internal policies which set out the basis or culture of acting ethically and in accordance with highest

professional standards. The below listed related policies are accessible to all our colleagues through our intranet:

- [Whistleblowing Policy & Procedure](#)
- [Safeguarding Policies](#) and Procedure
- [Anti-Fraud, Bribery, Corruption and Thefts Policy](#)
- [Code of Conduct](#)
- Code of Governance
- Incident Reporting
- [Equality, Diversity & Inclusion Policy](#)
- [Procurement Policy](#)
- [Recruitment Policy](#).

Risk and supply chain management

The UK is perceived as a low-risk country for modern slavery, and we have also assessed our risk as low. Despite this, we have identified possible or likely areas that may increase the possibility of modern slavery such as:

- Supply chains
- Property and estate maintenance
- Construction
- Labour-intensive services procured directly or indirectly
- In homes where vulnerable residents may reside
- In properties that have been sublet or taken over.

To mitigate these risks, we've put controls and actions in place, including:

- Putting the right safety mechanisms in our procurement framework and contracts
- Increasing awareness and vigilance amongst colleagues who are in contact with service providers on our estates and construction sites, through ongoing campaigns and training
- Engaging only with suppliers and contractors who confirm their compliance with the [Modern Slavery Act 2015](#)
- Reporting processes which enable us to record and act on reports of overcrowding and neighbour nuisance issues as well as safeguarding concerns (ASB/MS/HT etc.)
- Conducting pre-employment checks on all colleagues and only engaging with agencies who do similar checks, confirmed in contracts with them.

Progress monitoring and training

- We continued to undertake all the activities we carried out in previous years and in addition we achieved the following: Re-launched the Modern Slavery Working Group (MSWG), chaired by the Corporate Lead of Safeguarding and sponsored by the Executive Director of People and Culture
- Launched simple and easily accessible reporting tool for all concerns to be raised directly to the Safeguarding Team
- Continued knowledge and awareness building of modern slavery by creating a dedicated page on our intranet and publishing articles, podcasts, and links to other related resources

- Developed an e-learning programme for colleagues to:
 - further improve understanding of the implications of the [Modern Slavery Act 2015](#)
 - know what they should do to recognise and report potential concerns.
- Liaised with the Safeguarding Team to ensure our reporting system is in place and communicated to residents and colleagues.

2025-26 Action Plan

We will continue to undertake all the activities we carried out in previous years and in addition we will focus on:

- Improving visibility of our suppliers' full supply chains to provide transparency regarding how suppliers monitor their sub-contractors
- Increasing resident and customer awareness on how to spot the signs of modern slavery and what to do when people have concerns. This will include resident involvement and targeted campaigns in areas where the possibility of modern slavery is higher.
- Ensuring all colleagues are aware of how to spot the signs of modern slavery and what to do when they have concerns. This includes use of different media, further promotion of resources available such as our dedicated modern slavery intranet page as well as e-learning for general awareness and developing further bespoke training for colleagues in higher-risk roles for in-depth learning of:
 - the subject of modern slavery and human trafficking
 - what forms it takes
 - how to spot the signs
 - how to report concerns.
- Communicating and ensuring awareness of our [Southern Housing Anti-Slavery and Human Trafficking Policy](#) and Procedure which confirm our zero-tolerance approach to modern slavery
- Publish case studies of incident relating to modern slavery internally and externally to continue to raise awareness on how the topic can present
- Organising an annual anti-slavery event on 18 October to raise awareness and link with other related events throughout the year.

This statement

This statement applies to Southern Housing and all its subsidiaries for the financial year ending 31 March 2026. We will review this statement annually to address legislative, regulatory, best practice, or operational changes.

Controls

Version 3.1 – effective 7 October 2025