



MODERN SLAVERY STATEMENT

2025/2026

1. Introduction and Organisation Structure

The Housing Plus Group ('the Group') is a Community Benefit Society registered with the Financial Conduct Authority under the Co-operative & Community Benefit Society Act 2014.

Our main business is the provision of social housing and care and support. In addition, we deliver wrap around services for our tenants, customers and service users and work in partnership with others to create opportunities and maximise our social impact for the benefit of those who live in our homes and our local communities.

We create places people are proud to call home.

The Housing Plus Group has 4 subsidiaries, Care Plus, Housing Plus Group Finance Limited, Homes Plus and The Wrekin Housing Group. Homes Plus, has 3 subsidiaries County Town Homes, Development Worx Limited and Severn Homes; and The Wrekin Housing Group Limited has 3 subsidiaries, Choices Housing Association Limited, Old Park Services Limited and Strata Housing Services Limited as shown in the structure here [Our Group - Housing Plus Group](#)

The Housing Plus Group is regulated by the Regulator of Social Housing, with Care Plus regulated by the Care Quality Commission and Choices Housing Association regulated by the Care Quality Commission and the Regulator of Social Housing.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. The principles and terms within this document apply to Slavery and Human Trafficking measures within The Group for the financial year starting 1 April 2025 and ending 31 March 2026. This statement covers The Housing Plus Group and its Group Subsidiaries as shown [Group-structure---company-details-Jan25-1.pdf](#)

The Housing Plus Group is one of the leading providers of housing, care and support services in the West Midlands, with over 33,000 homes across Shropshire, Staffordshire and Telford & Wrekin.

We're a forward-thinking organisation and everyone at HPG shares a real passion for helping the people and communities we serve. We have extra support services for customers who need it, including money advice and help for people seeking employment.

We're also doing our bit to tackle the housing crisis by committing to build at least 1,000 new affordable homes each year. This includes social and affordable homes, low-cost home ownership and other schemes to help people get on the housing ladder such as rent-to-buy.

Over the next few years, we're aiming to become a 40,000-home association, supporting over 80,000 customers.

This statement is published on our Group website, our internal intranets and the Modern Slavery Statement Registry.

2 Statement

As a business we are committed to upholding the highest standards of probity, openness and transparency so we can provide the best services to our customers.

We are committed to developing and improving our practices and policies, to identify, prevent and combat the existence of slavery and human trafficking within our business and supply chains.

We are, and will continue to, address the issue with appropriate urgency and seriousness, devoting time and resources to meet our obligations and good practices.

We expect those we work with to have the same approach and we would not work with any organisation whose approach or practices are incompatible with our own.

3 Supply Chains and due diligence

One key area of risk of modern slavery lies in our relationships with supply chains – suppliers, contractors, developers and business partners.

We are committed to ensuring that from the development of new homes, to the repairs and maintenance of our existing stock; and the business support and professional services we commission, our supply chains are clear to prevent and expose evidence of slavery and human trafficking.

All procurement is subject to the Procurement Act 2023 regulations which came into force in February 2025.

All our first-tier goods and services are from UK based suppliers, although we recognise that supply chains are global.

We acknowledge that no supply chain can be entirely free from the potential of slavery or human trafficking and that the global context can result in increased fluidity of suppliers.

Pro-active action and ongoing diligence on our part in relation to our procurement practices is fundamental to our probity as a business.

We expect our suppliers to comply with our modern slavery obligations. This is ensured through our procurement processes and contract management procedures.

We have an expectation that those in our supply chain and those who contract with us comply with our values and we rely on our ethically guided approach to procurement to determine the suitability of potential suppliers.

As a housing developer it is important to us that our sub-contractor employment arrangements and material supply chains are congruent with our own practices to combat modern slavery and human trafficking.

To make sure our suppliers, contractors and developer partners are aware of, and comply with our values we use a number of approaches including:

- Contractor pre-qualification to ensure minimum standards, allied with robust new supplier processes.
- All new and existing suppliers and contractors are asked to provide evidence of how they mitigate the risk of modern slavery in their business and in their own supply chains and sub-contractors.
- All suppliers and contractors are asked to declare that they have not been involved in any modern slavery and human trafficking offences.

- Robust contract management and supplier review processes, including an annual review of our suppliers and contractors Modern Slavery statements.
- Suppliers are required to have an equality and diversity policy or equivalent, or sign up to our own, which will include referencing our commitments to our Modern Slavery Statement.
- Contract clauses to ensure legal compliance by suppliers.

During 2025 we developed our new Modern Slavery Supply Chain Audit Toolkit and completed an initial pilot working with both QA Kitchens, one of our major suppliers and our developer partner, KEON. The findings of this initial pilot are being evaluated with the aim of embedding into standard contract management practices going forwards.

4 Tenants, Customers and Service Users

We recognise that with over 60,000 people living in our homes there is potential for our, tenants, customers and service users to be affected or impacted by modern slavery.

We have policies and procedures in place to ensure that employees are vigilant to the signs and risks for those who may be vulnerable within our sector and business operations.

Our safeguarding policies, procedures and campaigns continue to remind all staff to be aware of the signs of abuse, including domestic abuse and modern slavery. Our Equality Diversity and Inclusion (EDI) awareness training for staff incorporates modern slavery, the signs to look out for and the importance of remaining vigilant.

Through a number of our strategies and policies we demonstrate our commitment to respecting human rights and operating in an ethical way with integrity.

All of our new customers go through right to residency, work/economic status and tenancy reference checks.

We recognise that partnership working is an integral part of our approach and we will continue to build on existing links, with agencies such as the police and local authorities, and create new ones as needed, to share intelligence and take action where necessary to prevent and detect modern slavery.

We will sensitively look to share lived experience stories to remind staff, partners, contractors and customers of why diligence and awareness is so important to addressing modern slavery.

Locality based working enables teams to work together more closely, creating more opportunities to share information, which might include signs of abuse or modern slavery and to act swiftly upon these.

This approach, combined with further data insights, could help identify where customers may be showing signs that something more is happening in their lives, related to their welfare, including any potential for modern slavery.

5 Employment

We recognise that there is potential for employees to be affected by modern slavery and human trafficking.

We have robust policies and procedures in place which are regularly audited to ensure compliance with employment legislation and we encourage employees to report any concerns relating to business activities.

Our Whistleblowing & Safeguarding policies ensure that our staff have an awareness of vulnerable people and how to report any concerns that they may have.

These policies make it easy for employees to raise concerns in confidence and to ensure they are safeguarded from any abuse whilst in our employment

In terms of recruitment, our procedures and approach ensures that all staff employed by the Group and all prospective employees are legally entitled to work in the UK.

Our recruitment processes and employment checks include the verification of identity and right to work in the UK, appropriate level DBS checks and qualification and reference checks.

We acknowledge a potential risk is the use of recruitment agencies for a small number of temporary or bank staff and therefore have introduced service level agreements which ensure equivalent checks within the recruitment process.

We are committed to ensuring our main agency suppliers are verified members of the Procurement for Housing Recruitment Framework.

6 Training for Staff

All staff undertake a mandatory Modern Slavery Awareness e-learning module. Staff must also complete mandatory safeguarding training, which helps colleagues identify any issues or concerns when working with customers, including in their homes.

We continue to develop our training and awareness raising programmes relating to modern slavery to ensure all employees understand their responsibilities and are aware of the issues and risks.

Senior Managers consider where the greatest risk of modern slavery or human trafficking may arise in their parts of the business and ensure that their staff and teams are aware of the risks and access any necessary training.

Our EDI Steering Group, led by the Executive Director of Integration and Change, monitors and tracks progress on staff training plans in relation to our EDI learning interventions, including modern slavery.

The Group's procurement team are members of the Chartered Institute of Procurement & Supply (CIPS) and are required to achieve an annual certification in "Ethical procurement and supply" as accredited by CIPS.

Board and Committee members receive awareness of Slavery and Human Trafficking via internal communications and are signposted to the People and/or Procurement teams if they have any concerns or observations.

7. Future Action

The Housing Plus Group is continually reviewing its approach to comprehensively tackling the issue of modern slavery.

Our priorities for the next 12 months include:

- Promote our zero tolerance to modern slavery through our regular virtual Making it Happen managers' briefing sessions.
- Monitor completion of mandatory e-learning modules.
- Expand our learning and development options for more indepth modern slavery training for staff who have specific responsibility for procurement and contract management.
- Deliver mandatory recruitment training for all hiring managers.
- Continue to improve the monitoring of our contractual and procurement arrangements with regards to modern slavery.
- Pilot, review and implement our Modern Slavery Supply Chain Audit Toolkit.
- Use our Equality Impact Assessments as a further chance to consider modern slavery prevention and action to address if identified.
- Through our locality working and tenancy visits we will ensure staff are looking out for, and acting upon, any signs of modern slavery.
- Use data insight to identify where customer behaviour may suggest a welfare concern, including modern slavery.
- Sensitively capture and share any lived experience stories to show the impact modern slavery can have and why prevention and robust action are so important.
- Further develop our partnership approach to deter and identify modern slavery and to implement a joined-up response where this may happen.

This statement is made under section 54 (1) of the Modern Slavery Act 2015 and will be reviewed and updated on an annual basis.

The Board has overall responsibility for approving this statement before publication and approved this statement on 24th September 2025.

Signed:

A handwritten signature in black ink, appearing to read 'W. Gethings', with a stylized flourish at the end.

Wayne Gethings
Chief Executive