



Modern Slavery and Human Trafficking Statement

Financial year 31

March 2026

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Modern Slavery and Human Trafficking Statement

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Policy Links:	Internal Anti-Money Laundering Policy Raising Concerns Policy Code of Conduct Procurement Rules Safeguarding External Modern Slavery Act 2015 NHF (National Housing Federation) Code of Governance RSH (Regulator of Social Housing) Regulatory Standards-Governance and Financial Viability Standard

Brief Policy Summary:

Organisations with an annual turnover of at least £36m are required to make an annual Statement about their approach to tackling modern slavery in its various forms which may impact on LHP's activities such as procurement and supply chains.

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Lincolnshire Housing Partnership (LHP)

Modern Slavery and Human Trafficking Statement 2025/26

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps Lincolnshire Housing Partnership (LHP) has taken during the financial year ending 31 March 2026 to prevent modern slavery and human trafficking within our organisation and supply chains. This statement has been prepared in line with the latest Transparency in Supply Chains statutory guidance issued by the Home Office

Introduction

1. Lincolnshire Housing Partnership recognises that modern slavery, forced labour and human trafficking are serious violations of fundamental human rights. We are committed to acting ethically, transparently and with integrity across all aspects of our business and expect the same high standards from our suppliers, contractors and partners. As a large social housing provider operating within complex operational and supply chain environments, we acknowledge that risks may exist within the sectors in which we operate, particularly within construction, repairs and maintenance, subcontracted services, agency workers and wider procurement activities. We are committed to continually strengthening our approach to identifying, assessing and mitigating those risks. This statement outlines the steps LHP has taken during 2025/26 to understand and address modern slavery risks and sets out our commitment to continuous improvement.

Our Organisation, Business and Supply Chains

2. Lincolnshire Housing Partnership is a registered provider of social housing operating primarily across Lincolnshire and surrounding areas. We manage and maintain more than 12,500 homes and provide a broad range of housing, repairs, asset management and community-based activities. As a charitable community-based organisation, we channel profit back into services and projects that benefit our customers and local neighbourhoods. Our annual turnover is £67 million.
3. Our operations include directly employed colleagues across housing, repairs, corporate and support services, alongside a wide range of suppliers and contractors who support service delivery.
4. Our supply chains include:
 - Repairs and maintenance contractors
 - Materials and equipment suppliers
 - Fleet
 - Professional and corporate services
5. We recognise that modern slavery risks are more likely to arise where there are complex subcontracting arrangements, lower-skilled employment markets, and temporary workers. During the year, we have continued to improve our understanding of our supply chains, particularly within higher-risk operational areas.

Compliance

6. LHP maintains a framework of policies and governance arrangements that support our commitment to preventing modern slavery and promoting ethical business practices. These policies establish clear expectations regarding ethical conduct, fair treatment, safeguarding and legal compliance.
7. Together, these policies support a culture where colleagues and stakeholders are encouraged to raise concerns and where unacceptable practices, including exploitation and forced labour, will not be tolerated.
8. We are opposed to slavery and human trafficking. We will do what we can to combat such abuse in our business and in our supply chains.
9. Our procurement and contract management arrangements require suppliers and contractors to comply with relevant legislation and expected standards of conduct. We continue to strengthen our contractual and assurance requirements to ensure suppliers understand our expectations regarding ethical employment practices, and modern slavery prevention.

Due Diligence Process

10. LHP undertakes proportionate due diligence to identify, prevent and mitigate modern slavery risks within our operations and supply chains.
11. Prior to engagement, suppliers are subject to appropriate procurement checks and contractual requirements, including expectations relating to legal compliance and ethical conduct. Throughout contracts, supplier performance and conduct are monitored through operational and contract management arrangements.
12. During the year, we have continued to strengthen our approach through:
 - Enhanced supplier oversight and assurance processes
 - Increased focus on subcontracting arrangements
 - Greater consideration of recruitment practices
 - Improved alignment between procurement, finance, risk and assurance functions
13. We have a meticulous recruitment and onboarding process which ensures all colleagues have the legal right to work in the UK. This work is completed prior to all colleagues' contract date and will only use reputable employment agencies, and we will always verify the practices of any new agency before engaging with it.
14. We will act ethically and with the highest standards of integrity, quality, probity, openness, and accountability in all our business operations and relationships.
15. We continue to develop, implement, and enforce processes and controls that seek to ensure slavery and human trafficking is not taking place within our business nor in our supply chains, and have during the financial year continue to review our suppliers who are subject to the Modern Slavery Requirements to ensure that where required they have

published a Modern Slavery Statement.

16. We will not knowingly deal with any business involved in slavery or human trafficking.
17. LHP maintains mechanisms through which concerns relating to unethical conduct or potential exploitation can be raised. Colleagues, contractors and stakeholders have access to raising concerns arrangements and safeguarding processes supported by clear escalation routes through management and governance structures.
18. Where concerns are identified, LHP is committed to taking appropriate action, including working with suppliers and relevant agencies to investigate issues, implementing corrective actions and, where necessary, terminate supplier relationships.

Assessing and Managing Risk

19. LHP adopts a risk-based approach to identifying and managing modern slavery risks as part of our wider governance, risk management and assurance framework.
20. Risk considerations are assessed through procurement activity, operational oversight, supplier engagement and assurance processes. This includes collaboration between procurement, repairs, health and safety, governance and leadership teams to identify and respond to emerging risks.
21. We recognise that heightened risks may exist within:
 - Construction and maintenance supply chains
 - Subcontracted works
 - Temporary or agency workforce arrangements
22. Our approach continues to evolve as we strengthen supply chain visibility and improve our understanding of where potential vulnerabilities may exist.

In our Supply Chain

23. Our procurement activities take place in England, and our contractors and suppliers are predominantly UK based. We engage with a wide variety of organisations for a broad range of goods and services which are primarily corporate, construction and property related, but also to meet some more specialist requirements.
24. Some of our suppliers' sub-contract work or rely on recruitment agencies to supply permanent or temporary colleagues. Whilst we consider that the risk in our supply chains is low, we recognise that no supply chain can be considered entirely risk-free.
25. Our robust tendering process ensures we engage with reputable contractors and suppliers who adhere to all appropriate legislation, regulation, and practices. We evaluate the recruitment techniques of any contractors bidding for work on contracts which represent a high risk of modern slavery.
26. Our contract management arrangements help us ensure they maintain the standards required, including the prevention of slavery and human trafficking.

27. As part of our ongoing commitment to contract management, we actively conduct visits at locations where LHP contractors are undertaking works supporting awareness of where issues of Modern Slavery may occur.
28. We require that suppliers be compliant with the Act where a contract is renewed during the year, or any new contract has been entered into. To achieve this our procurement process ensures adequate screening is in place throughout.
29. We will continue to ensure that our approved suppliers take appropriate steps to comply with the Act and require new suppliers to declare that they are not involved in slavery or human trafficking.
30. LHP continues to strengthen its procurement processes, and internal guidance is regularly published to colleagues supporting them in their duties in preventing and identifying incidents of modern slavery. This will further support our commitment to the prevention of slavery and human trafficking.

LHP Customers

31. LHP understands that modern slavery can have a significant impact on customers and communities, particularly those who may already be vulnerable due to age, disability, health, financial hardship or other circumstances.
32. As part of our safeguarding arrangements, colleagues are supported through training to identify potential indicators of modern slavery, human trafficking, exploitation and coercive control during customer interactions, home visits and neighbourhood activity.
33. Where concerns are identified, these are managed through established safeguarding procedures and, where appropriate, referrals are made to relevant agencies and support services.
34. This approach helps ensure that modern slavery considerations are embedded within our customer-facing activities and that individuals at risk are identified and supported as early as possible.

Training and awareness

35. LHP recognises that awareness and understanding are critical in preventing modern slavery. We may come across slavery and human trafficking in connection with the customers we support. In addition, our homes could be used for modern slavery. We have robust safeguarding procedures in place, and we will deliver training to raise awareness of what slavery and human trafficking might look like in our business; and to encourage key customer facing colleagues to report concerns.
36. We offer enhanced training for all colleagues covering What the Modern Slavery Act is, its implications, and how to report concerns.
37. Colleagues can raise concerns through a variety of methods including safeguarding and whistleblowing.
38. A contract management framework has been introduced and continues to be further

embedded through training workshops with colleagues.

Partnership Working

39. LHP is committed to working with local stakeholders to share information; taking a collective, coordinated and sustained effort to address modern slavery where concerns are raised.

Next Steps

40. LHP is committed to continuously improving its approach to preventing modern slavery and strengthening ethical practices across our operations and supply chains.
41. During 2026/27, our priorities will include:
 - Further improving supply chain visibility and mapping
 - Strengthening supplier engagement and due diligence processes
 - Enhancing training and awareness activity
 - Developing greater assurance and reporting over supply chain risks
 - Continuing to align modern slavery considerations within wider governance, procurement and assurance frameworks
42. We recognise that tackling modern slavery requires ongoing vigilance, collaboration and continuous development, and we remain committed to acting responsibly and transparently in helping to prevent exploitation and protect vulnerable individuals.

Conclusion

43. We have not identified any breaches of the Act during the financial year.
44. We will continue to be vigilant and where a compliance breach is identified, we will act promptly, involve the appropriate lead agencies and feedback lessons learnt to minimise the risk of an incident occurring again.
45. We will continue to raise awareness and deliver training to new and existing colleagues, and we will extend this to our suppliers and contractors, where appropriate.
46. This statement was made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes LHP's slavery and human trafficking statement for the current financial year.
47. This statement was approved by Board on 02 June 2026 and will be reviewed annually and published.
48. Signed on behalf of Lincolnshire Housing Partnership:

Simon Parkes
Chief Executive

Lincolnshire Housing Partnership

14-Jul-26

Signed by:

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