

Progress Housing Group Ltd Modern Slavery and Human Trafficking Statement

Financial year ending: March 2025

Introduction

Modern slavery refers to the exploitation of individuals through coercion, threats, or deception, trapping them in conditions they cannot escape. This is illegal and a violation of human rights. Combating modern slavery involves legal reforms, law enforcement, victim support, and international cooperation.

Progress Housing Group has a zero-tolerance approach to modern slavery and is fully committed to preventing slavery and human trafficking across all our operations. The Group is dedicated to maintaining transparency and addressing modern slavery across our supply chains, in line with the Modern Slavery Act 2015.

Our structure

Progress Housing Group owns and manages over 11,000 properties, including general needs, older people (independent living and Extra Care), homeowners (leaseholders and shared ownership), specialist supported housing for people with a learning disability, autistic people and those with a mental health condition, and supported housing (homelessness schemes and refuges), predominantly in Lancashire.

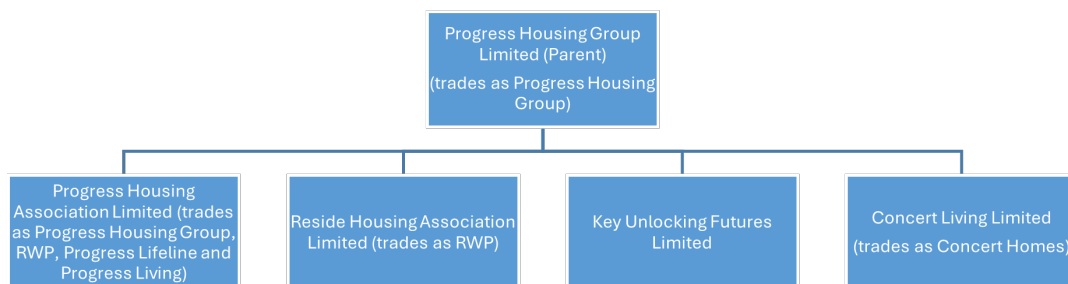
In addition, the Group also provides 573 units of key worker accommodation for people working for United Lincolnshire Hospitals NHS Trust and supported housing for people at risk of homelessness or women escaping domestic abuse.

Under its Progress Lifeline brand, the Group is a national leader in technology-enabled care (TEC), supporting over 60,000 people to live independently.

Progress Housing Group received V1 G1 compliance grading by the Regulator of Social Housing in December 2024.

The Group's vision is to ensure everyone has a place to call home and the opportunity to live their best life, and its mission is to have a positive impact on people and communities by providing high-quality homes, supporting independence and creating opportunities.

Our Group structure from September 2025 is as follows:



Our policies

The Group is committed to conducting all business with integrity and adopts high ethical standards. The Group's key policies related to combating modern slavery include:

- Sustainable Procurement Policy
- Approved Suppliers, Contractors, and Consultant Policy
- Safeguarding Adults Policy
- Unmet Need and Child Safeguarding Policy

These policies are regularly reviewed to ensure they remain effective and up to date in relation to modern slavery.

Due diligence processes

Progress Housing Group conducts thorough due diligence on all our supply chain partners. For any new contractor or supplier, steps are taken to ensure compliance with the Modern Slavery Act.

Performing rigorous due diligence checks on the supply chain ensures that suppliers and contractors adhere to ethical labour standards, reducing the risk of modern slavery infiltrating business operations.

If the Group becomes aware of any supplier which breaches the Modern Slavery 2015 Act, we will undertake an investigation immediately in accordance with our legal and moral obligations, which may lead to termination of our contract with them.

Our approach to managing risk

Progress Housing Group manages the risks of modern slavery effectively; we have an established and robust recruitment process, which is essential to ensure that all employees are hired legally and ethically, with thorough background checks and verification of work rights.

Safeguarding all tenants and customers is another crucial aspect. For example, the Group undertakes regular property inspections and has safeguarding measures in place to protect vulnerable individuals from exploitation.

The Group provides an online training course which helps employees recognise signs of modern slavery and understand that their role in preventing it is vital for creating an informed and vigilant workforce. In-person training is offered three times per year around safeguarding, which also covers Modern Slavery.

The Group conducts a tenancy fraud audit, which helps to detect and prevent illegal subletting and other fraudulent activities that could mask exploitative practices.

Group employees act as customer-facing observers and are trained in spotting signs of modern slavery such as financial exploitation, unusual visitors and behaviours. Colleagues work collaboratively with support providers, police, social services, and commissioners to prevent, identify and respond to modern slavery. Risk is assessed, and plans are put in place to protect our tenants, including notifying safeguarding teams.

Performing rigorous due diligence checks on the supply chain ensures that suppliers and contractors adhere to ethical labour standards, reducing the risk of modern slavery infiltrating business operations.

Finally, the Group has developed a robust contract management process, including clear contract clauses and monitoring mechanisms, so that the Group is able to swiftly address any identified issues.

Activities carried out in 2024/25:

- promoted Anti-Slavery Day in October 2024
- provided safeguarding training for all employees
- provided No Whispers Community Interest Company CIC County Lines training for employees
- promoted the regular No Whispers CIC County Lines training, sessions and information locally on our social media channels to tenants, customers and colleagues
- the Group promoted a training course on modern slavery. This is open to all employees and can be accessed at any time
- partnered with Forvis Mazars and hosted a webinar on 'understanding and addressing modern slavery' in the social housing and construction industry
- the Group undertook a review of its risk assessments and related controls in relation to the Criminal Finance Act and money laundering legislation

Scheduled activity for 2025/26:

- the Group will be actively involved in the promotion of Anti-Slavery Day on 18 October 2025
- the Group will make a commitment to review policies and procedures when required and update with modern slavery statements when necessary
- the Group will continue to use social media and the Group's intranet and websites to raise awareness amongst colleagues, tenants and customers
- the Group will continue to work closely with other local organisations and continue to explore options for further partnerships
- new safeguarding process improvements are being introduced, so safeguarding can be managed in core systems
- a modern slavery section is being added to a new Business Integrity Policy, which combines the current anti-fraud and social housing tenancy fraud policies
- To review our safeguarding policies so they are in line with our new processes.
- The group will develop a comprehensive Cuckooing Procedure to effectively manage these challenging cases. This will include a new case management system, staff training, and a toolkit specifically designed for officers who handle these complex situations.
- A marketing campaign is being created which is aimed at increasing tenants' awareness of the signs of cuckooing and how to report it.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending March 2025.

This statement has been approved by the Executive Board in August 2025.

Signed

A handwritten signature in black ink, appearing to read 'S. McDonnell', written in a cursive style.

Sheena McDonnell

Chair of the Board

Dated 22 August 2025

Signed

A handwritten signature in black ink, appearing to read 'Jacqui De-Rose', written in a cursive style.

Jacqui De-Rose

Chief Executive

Dated 22 August 2025