

Hebridean Housing Partnership

Modern Slavery and Human Trafficking Statement

Financial Year Ending 31 March 2027

Our commitment to acting ethically, transparently and with integrity in our operations, procurement activity, partnerships and supply chains.

Organisation	Hebridean Housing Partnership (HHP)
Statement period	Financial year ending 31 March 2027
Approval	Board
Purpose	To set out the steps HHP takes to prevent modern slavery, human trafficking, forced labour and exploitation within our organisation and supply chains.

Approved by: HHP Board | **Date:** 25.08.2026

Introduction

This statement confirms Hebridean Housing Partnership's (HHP) commitment to preventing modern slavery, human trafficking, forced labour and exploitation within our organisation and throughout our supply chains.

Although HHP is not legally required to publish a statement under the Modern Slavery Act 2015, we are doing so to meet our contractual obligations with a third party and to demonstrate our commitment to acting ethically, transparently and with integrity in all of our business activities.

This statement outlines the steps HHP has taken, and will continue to take, to identify, assess and mitigate risks of modern slavery and human trafficking.

This statement covers:

- Our organisation and operations
- Risk assessment and management
- Due diligence arrangements
- Recruitment and employment practices
- Procurement and supply chain management
- Staff training and awareness
- Monitoring and measuring effectiveness

Our Organisation

HHP is the registered social landlord for the Outer Hebrides, responsible for providing, maintaining and improving affordable housing and associated services across the islands.

HHP manages and develops homes, supports tenants and communities, and works with a range of contractors, consultants, suppliers and public sector partners.

As a community-focused organisation, we are committed to protecting the wellbeing, dignity and human rights of our tenants, service users, employees and stakeholders.

Our Commitment

HHP opposes all forms of modern slavery and exploitation.

We are committed to:

- Acting ethically and responsibly in all business relationships.
- Preventing modern slavery within our organisation and supply chains.
- Promoting awareness amongst staff and contractors.
- Supporting vulnerable individuals who may be at risk of exploitation.

- Working with statutory and third-sector partners where concerns are identified.
- Continuously reviewing and strengthening our approach to modern slavery prevention.

Risk Assessment

HHP recognises that certain sectors and groups may face a higher risk of exploitation, including:

- Migrant workers.
- Temporary and agency workers.
- Low-paid workers.
- Individuals experiencing poverty or financial hardship.
- People with disabilities or support needs.
- Vulnerable tenants and service users.

Whilst HHP operates primarily within Scotland and is considered a low-risk organisation for modern slavery, we acknowledge that risks can arise through:

- Construction and maintenance supply chains.
- Procurement of goods and services.
- Contracted labour and subcontracting arrangements.
- Recruitment activities.
- Customer-facing services where signs of exploitation may be identified.

We therefore adopt a risk-based approach to identifying and managing modern slavery risks.

Due Diligence

HHP undertakes due diligence processes designed to reduce the risk of modern slavery occurring within our operations or supply chains.

These include:

Suppliers and Contractors

- Procurement processes that require suppliers to comply with all relevant employment and human rights legislation.
- Appropriate pre-contract checks on suppliers and contractors.
- Consideration of ethical and social responsibility factors during procurement exercises.
- Contractual requirements to comply with applicable legislation, including the Modern Slavery Act 2015 where relevant.
- Investigation of any concerns raised regarding labour practices.

Business Operations

- Internal controls and governance arrangements that promote ethical conduct.
- Financial and procurement controls to identify unusual or inappropriate activity.
- Whistleblowing arrangements that allow concerns to be raised confidentially.
- Safeguarding arrangements to support vulnerable customers and communities.

Policy Framework

HHP maintains a range of policies and procedures that support the prevention of modern slavery and exploitation.

These include:

- Codes of Conduct for Staff and Board Members
- Procurement Policy
- Safeguarding Policy
- Whistleblowing Policy
- Equality, Diversity & Inclusion Policy
- Recruitment and Selection Procedures
- Sexual Harassment Policy
- Health and Safety Policy
- Complaints Policy

Together, these policies promote fair treatment, ethical behaviour, equality, inclusion and protection from exploitation.

Recruitment and Employment Practices

HHP is committed to fair and lawful employment practices.

We aim to ensure that:

- All employees have the legal right to work in the UK.
- Recruitment processes are transparent and compliant with employment legislation.
- Employees receive written terms and conditions of employment.
- Pay and benefits comply with legal requirements and organisational policies.
- Staff are free to leave employment in accordance with contractual arrangements.
- No employee is subjected to forced labour, servitude or coercion.

Safeguarding and Tenant Support

As a social landlord, HHP recognises that some tenants, applicants and service users may be vulnerable to exploitation.

Staff who work directly with customers are expected to:

- Remain alert to indicators of modern slavery and exploitation.
- Report safeguarding concerns through established procedures.
- Work with partner agencies, including social work services, Police Scotland and specialist support organisations where appropriate.
- Support individuals in accessing relevant advice and assistance.

Training and Awareness

HHP is committed to raising awareness of modern slavery across the organisation.

We will:

- Provide guidance to employees on recognising signs of modern slavery and exploitation.
- Include modern slavery awareness within relevant staff training programmes.
- Ensure managers understand their responsibilities in identifying and escalating concerns.
- Promote information on reporting routes and support services.

Particular focus will be given to employees working in procurement, contract management, housing management, estates and maintenance services, and customer-facing roles.

Measuring Effectiveness

To assess the effectiveness of our approach, HHP will:

- Review modern slavery risks as part of regular governance and risk management processes.
- Monitor safeguarding concerns and referrals where exploitation may be suspected.
- Review procurement and contract management arrangements.
- Monitor staff awareness and training completion.
- Investigate any reports or allegations relating to modern slavery.
- Review this statement annually and update actions where necessary.

Commitments for 2026/27

During 2026/27 HHP will:

1. Review modern slavery risks within key procurement and contractor arrangements.
2. Promote awareness of modern slavery amongst Board and employees.
3. Ensure safeguarding procedures remain effective and up to date.
4. Consider modern slavery risks within relevant policy reviews.
5. Maintain clear reporting mechanisms for employees, tenants and stakeholders.
6. Review supplier expectations regarding ethical employment practices and compliance with legislation.

Approval

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 and sets out the steps Hebridean Housing Partnership has taken to minimise the risk of modern slavery and human trafficking within its organisation and supply chains.

Approved by the Board of Hebridean Housing Partnership.

Signed: _____

Chair of the Board

Date: _____

If you require support or wish to report concerns relating to modern slavery or exploitation, you can contact the Modern Slavery & Exploitation Helpline on

08000 121 700 or visit www.modernslaveryhelpline.org.