



Modern Slavery and Human Trafficking Statement 2025

Introduction

At Metropolitan Thames Valley (MTVH), we recognise that modern slavery and human trafficking are among the greatest violations of human rights. We are committed to ensuring that these abuses have no place in our business activities, our subsidiaries, or supply chains. Tackling modern slavery is a priority for MTVH and forms a central part of our approach to ethical governance, sustainable procurement, and reasonable business practices.

We are conscious of the influence we hold as one of the UK's leading providers of affordable housing and support services for communities who need it most and accept our responsibility to act transparently and decisively. This statement sets out the actions we have taken over the past year, as well as our ongoing commitments, to identify, prevent, and respond to the risks of modern slavery in our operations and supply chains.

1. Our Organisational Structure, Business and Supply Chains

Metropolitan Housing Trust Limited (MHT) is the parent company of the Group. The Group has a number of subsidiaries, including Thames Valley Housing Association Limited (TVHA), and holds several joint venture interests.

This Statement covers MHT and all its subsidiaries. A chart showing our group structure can be found [here](#).

MHT and TVHA are Community Benefit Societies - registration details can be found on the Mutuels Register managed by the Financial Conduct Authority. Both are Registered Providers of Social Housing regulated by the Regulator of Social Housing. At the year ended 31 March 2025 the Group owned and managed 55,000 homes and employs 2,000 staff and had a turnover of £454M. MTVH developed 544 new homes during the year.

MTVH's business activities include:

- The development of affordable rent and shared ownership and market sale housing.
- The provision and management of affordable housing for people living in London, the Southeast, East Midlands and East of England.
- The provision of property and other services relating to the affordable housing that MTVH provides.
- The provision of supported housing and supported living services. Our specialist areas include older people, mental health and transitional services which provide intensive support to marginalised or vulnerable people.
- The provision of training programmes, events and activities for our residents, designed to boost employment opportunities and foster stronger communities.

Our supply chains primarily consist of UK-based contractors, suppliers, and service providers. While our supplier base is predominantly domestic, we recognise that certain goods and materials may originate overseas, where there may be heightened modern slavery risks.

2. Our Policies and Procedures

MTVH maintains a suite of policies and procedures that collectively demonstrate a clear and consolidated approach to identifying, preventing, and responding to modern slavery risk. These include:

- Sustainable Procurement Policy
- Code of Conduct for Suppliers
- Whistleblowing Policy
- Recruitment and Selection Policy
- Safeguarding Policy
- Equality, Diversity and Inclusion Policy.

These policies ensure:

- Clear expectations for ethical behaviour from all suppliers and partners
- Accessible channels for reporting concerns without fear of reprisal.
- Recruitment practices that prevent forced or bonded labour
- A procurement process embedding ethical sourcing principles.
- Safeguarding procedures to protect vulnerable residents in our communities.

3. Due Diligence

MTVH applies robust due diligence to its supply chain to mitigate modern slavery risks:

- All potential suppliers complete an initial self-assessment as part of the tender process, answering questions on ethical sourcing and modern slavery compliance.
- Under the MTVH's Sustainable Procurement Policy, suppliers must provide evidence of training programmes, internal policies, and partnerships demonstrating their efforts to combat modern slavery.
- From October 2025, MTVH's new Supplier and Contract Management system will enable regular, structured modern slavery risk assessments across our supply chain.
- MTVH is in the process of onboarding Alcumus, a specialist supply chain due diligence provider, to enhance our oversight of third-party risks.
- MTVH is broadening its modern slavery clause in its contracts to strengthen contractual obligations and remedies.

MTVH conducts full due diligence before appointing subcontractors and maintains a structured audit schedule to ensure compliance with Home Office regulations. This

includes checks on umbrella companies, which must be affiliated with recognised bodies such as the FCSA or Professional Passport.

4. Risk Assessment and Management

MTVH assesses modern slavery risks across its operations and supply chain through:

- Pre-tender risk screening for all suppliers
- Ongoing contract management reviews
- Targeted checks for higher-risk goods and services.

Since last year, we have:

- Increased monitoring of training compliance, leading to a significant improvement in completion rates.
- Enhanced supplier monitoring through the upcoming SRM system, launching October 2025.

5. Key Performance Indicators (KPIs)

MTVH uses the following KPIs to measure its effectiveness:

- Percentage of staff completing modern slavery training – target: 95% of frontline colleagues annually.
- Percentage of suppliers completing self-assessment questionnaires – target: 100% before contract award
- Percentage of contracts containing modern slavery clauses – target: 100%.

For 2024/25, we have achieved:

- 98% completion rate of our mandatory Safeguarding Awareness training module for all colleagues. 100% supplier self-assessment completion rate for new contracts
- 94% of contracts containing modern slavery clauses (expected to reach 100% in 2025/26 following contract updates)

6. Training and Awareness

MTVH has training in place to ensure that colleagues understand the signs of slavery or human trafficking and know how to report this. This is included within the mandatory Safeguarding Awareness course, which is taken by all colleagues every year. In addition, an online training course covering understanding and identifying slavery and human trafficking in greater detail is accessible to colleagues. Hiring managers receive training on right to work checks as part of the Safer Recruitment course, ensuring consistent and compliant practices across all hiring processes.

The Act and our approach to reducing slavery and human trafficking is promoted through our intranet and the Safeguarding Policy Statement.

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Planned Actions for the Next 12 Months

In 2025/26, we will:

- Fully implement our Supplier and Contract Management system and embed governance through our Supplier Relationship Management Strategy
- Broaden our modern slavery clauses in contracts
- Increase the depth of supplier due diligence through Alcumus data insights
- Conduct periodic modern slavery risk assessments for all high and medium risk suppliers.
- Review our central supplier of temporary and contingent workers– this contract renewal will be aimed at strengthening governance and ensuring safer recruitment practices and will enable tighter control over compliance with ethical standards including modern slavery legislation.

This statement is made pursuant to S54 of the Modern Slavery Act 2015 and constitutes our Modern Slavery & Human Trafficking Statement for the year ended 31 March 2025 and has been approved by the Board, who will review and update the statement annually.

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

Melbourne Barrett, Chief Executive
September 2025