

Modern Slavery and Human Trafficking Statement 2026

For the financial year ended 31 March 2026

Introduction

Metropolitan Thames Valley Housing (MTVH) recognises modern slavery and human trafficking as serious violations of human rights. We are committed to preventing these abuses within our operations, subsidiaries and supply chains, and to responding effectively wherever concerns arise.

As a major provider of affordable housing and support services, we have a responsibility to act transparently, apply appropriate scrutiny and use our influence responsibly. This statement describes the steps taken during 2025/26 to identify, prevent and manage modern slavery risks, and sets out our priorities for 2026/27.

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 and Registered Providers of Social Housing regulated by the Regulator of Social Housing. For the year ended 31 March 2026, the MTVH Group owned and managed 57,500 homes and employs 2,000 staff and had a turnover of £461M.

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. Policies and procedures

Our policy framework supports the prevention, identification, reporting and response to modern slavery risks. Relevant current policies include:

- Sustainable Procurement Policy
- Safer Recruitment Policy
- Safeguarding Children Policy
- Safeguarding Adults at Risk Policy
- Diverse Needs and Vulnerabilities Policy
- Domestic Abuse Policy

- Whistleblowing Policy
- Diversity, Equity and Inclusion Policy
- Code of Conduct for Board Members, Colleagues and Involved Residents

Together, these policies establish expectations for ethical conduct, safer recruitment, responsible procurement, safeguarding, inclusion and confidential reporting.

3. Procurement and supply chain due diligence

During 2025/26, MTVH continued to embed its Supplier Relationship Management approach, improving visibility of supplier performance, risk and governance across key contracts. Procurement activity continued to focus on higher-risk categories, including labour provision, construction, maintenance and facilities-related services, where modern slavery risks may be more prevalent.

- Potential suppliers complete proportionate due diligence as part of tendering and onboarding, including questions on ethical sourcing, labour practices and modern slavery compliance.
- Modern slavery risk is considered through procurement, contract award and ongoing contract management, with enhanced scrutiny for higher-risk categories.
- The implementation of the Procurement Act 2023 has reinforced expectations relating to supplier governance, transparency, exclusions and contract management.
- Modern slavery requirements and remedies are being strengthened in relevant procurement and contractual documentation.
- Supplier Relationship Management arrangements support structured oversight, escalation and assurance across key contracts.

Following further review, the proposed onboarding of Alcumus has not yet been implemented. MTVH considered the potential cost and administrative burden that supplier accreditation models may place on smaller suppliers and SMEs. Further work is required to identify a proportionate approach that improves supply chain risk visibility without creating unnecessary barriers for SMEs, voluntary, community and social enterprise organisations, and social value-focused suppliers.

4. Risk assessment and management

We assess modern slavery risks across our operations and supply chains through pre-procurement screening, supplier due diligence, contract management, safeguarding practice, recruitment controls, colleague feedback and assurance activity. Our approach is risk-based and proportionate, recognising that higher exposure may arise in labour provision, construction, maintenance, facilities services and complex supply chains.

The central supplier of temporary and contingent workers has been selected. Contract terms are now being negotiated and will be signed before implementation. Rollout will focus on effective delivery, stronger governance, safer recruitment, health and safety, and tighter control of compliance with ethical standards, including modern slavery legislation.

Since last year, we have:

- Continued monitoring of mandatory compliance training, maintaining high completion rates across the organisation and supporting ongoing awareness of safeguarding and modern slavery risks
- Enhanced supplier monitoring through the SRM system, launched in October 2025.

5. Safeguarding, vulnerability and our response

Modern slavery, vulnerability and safeguarding are closely connected. People experiencing financial hardship, poor mental health, disability, substance misuse, social isolation, domestic abuse or housing instability may face increased risk of exploitation.

We recognise modern slavery as a serious form of abuse and exploitation and therefore a significant safeguarding concern. We acknowledge that indicators may be hidden within wider concerns, including anti-social behaviour, domestic abuse, mental health issues or housing instability. As a housing provider, MTVH is well placed to identify potential indicators of exploitation. Through tenancy management, repairs visits, supported housing services, neighbourhood management and safeguarding activity, colleagues may encounter signs of abuse and exploitation that could otherwise remain hidden.

Where concerns arise, colleagues follow safeguarding and escalation procedures and work with partner agencies and relevant authorities to protect people, support recovery and help secure effective remedy.

6. Key Performance Indicators (KPIs)

MTVH uses the following KPIs to measure its effectiveness:

- Percentage of staff completing all mandatory training to include 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 2025/26, we have achieved:

- 97.7% 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 against a target of 100% with outstanding target carried forward into 2026/27, when management anticipated achieving full compliance.

7. Training and awareness

Mandatory safeguarding training supports colleagues in recognising indicators of abuse, exploitation and vulnerability, including circumstances that may be associated with modern slavery and human trafficking, and reinforces reporting and escalation route

The training emphasises professional curiosity and multi-agency collaboration. A more detailed online course on understanding and identifying modern slavery is also available. Hiring managers receive training on right-to-work checks and safer recruitment requirements. We will continue to strengthen targeted learning for colleagues and suppliers in roles or categories with greater exposure to modern slavery risk.

8. Measuring effectiveness and assurance

Effectiveness is monitored through a combination of training completion rates, procurement and supplier due diligence outcomes, contract management activity, safeguarding reporting, assurance reviews and management oversight. These measures help identify areas requiring further attention and inform future improvements to policies, procedures and controls. No material incidents of modern slavery were identified through the organisation's reporting and assurance processes during the reporting period; however, recognising the hidden nature of modern slavery, MTVH continues to focus on awareness, professional curiosity and early identification

9. Priorities for 2026/27

- Complete contract negotiation and mobilisation for the central supplier of temporary and contingent workers, embedding delivery, governance, safer recruitment, health and safety and modern slavery controls.
- Continue embedding Supplier Relationship Management and improve visibility of supplier performance, risk, governance and remediation.
- Determine a proportionate approach to enhanced supplier due diligence that improves assurance while maintaining accessibility for SMEs and social value-focused suppliers.
- Strengthen ethical recruitment and responsible procurement requirements, relevant contractual protections and escalation routes.
- Use data, assurance findings, colleague feedback and lessons from concerns to drive continuous improvement.

10. Our continuing commitment

MTVH will continue to evolve its policies, procedures and controls to strengthen the prevention, identification and response to modern slavery and human trafficking across our operations, services and supply chains. We will keep our framework under review to reflect changes in legislation, regulation, recognised good practice and risks identified through safeguarding, recruitment, procurement, contract management, colleague feedback and supplier assurance.

Our ambition is to move beyond minimum compliance by embedding a consistent, risk-based and person-centred approach. We will improve the clarity of roles and reporting routes; strengthen ethical recruitment and responsible procurement; enhance supplier due diligence, contractual protections and remediation arrangements; build capability through targeted learning; and apply data and assurance to drive improvement.

We will work collaboratively with colleagues, residents, suppliers, partners and relevant authorities to strengthen transparency, protect people at risk of exploitation and support effective remedy. Progress will be monitored through appropriate governance arrangements and reflected in future annual statements.

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 2026 and has been approved by the Board, who will review and update the statement annually.



Melbourne Barrett, Chief Executive
September 2026