



## Peaks & Plains Housing Trust – Modern Slavery Act Statement 2026

**Date of approval by Board: November 2025**

Signed: 

Mark Howden, CEO

### Purpose and scope of this Statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that the Trust has taken during the 2025/26 financial year to prevent modern slavery in our operations and supply chains.

The Board oversees this statement. The Senior Leadership Team is responsible for implementation and monitoring. This statement will be reviewed annually and published on our website in accordance with the Modern Slavery Act 2015.

### Organisational Structure

Peaks and Plains Housing Trust is a registered society under the Co-operative and Community Benefit Societies Act 2014 and a provider of social housing and related services registered with the Regulator of Social Housing.

The Trust owns and manages around 5300 properties across Cheshire East, Cheshire West and the High Peak area with our purpose to provide safe homes and thriving communities.

We deliver services directly and through third-party contractors with our workforce comprising of direct employees, sub-contractors, and agency staff.

This Statement applies to Cheshire Peaks and Plains Trust Ltd and the following subsidiaries:

Peaks & Plains Devco Limited

Peaks & Plains Tradeco Limited

### Policies, Procedures, Training and Awareness

The Trust's Whistleblowing Policy is reviewed every 3 years, having last been reviewed and updated in March 2025 and includes details on how to raise concerns.

The Trust's Safeguarding Policy directly supports and reinforces the Trust's efforts to combat and prevent modern slavery practices as the Safeguarding Policy commits the Trust to ensuring vulnerable adults and children, live free from harm and abuse with staff, volunteers and contractors being alerted to spotting signs of abuse, neglect and/or exploitation. The Policy was reviewed November 2025 and is reviewed every 3 years.

The Trust's Procurement Policy sets out our Procurement Code of Ethics that all staff must be aware of and adhere to as part of conducting procurement activity. This Policy was reviewed February 2026 and is reviewed every 3 years.

All staff receive training on the Modern Slavery Act 2015, understanding what slavery is, the signs to look out for and what to do if identified. In addition, all staff receive Safeguarding training.

### Risk Assessment and Procurement Due Diligence

The Trust's supply chain is predominantly UK based as we prioritise working with UK-based and local suppliers where feasible.

The Trust recognises that the procurement of goods, works and services – particularly in sectors such as construction, maintenance and facilities management (including cleaning and waste management), presents potential risks of modern slavery, human trafficking, or other forms of exploitation within multi-tier or complex supply chains.

To manage these risks, the Trust has incorporated within its procurement procedures, to assess the risk of modern slavery based on the nature of works or services being procured. As part of the tender process, supplier questionnaires include specific questions requiring suppliers to detail their compliance with the Modern Slavery Act and/or steps they take to safeguard against slavery and human trafficking within their own operations and supply chains.

The Trust's site rules for contractors which includes key information such as how to raise safeguarding concerns is included to all contractors.

For major construction and development projects, the Trust undertakes or commissions site audits that enable the Trust to spot and raise any concerns.

### Performance Indicators and Effectiveness Measures

- Whistleblowing incidents related to Modern Slavery – None reported
- H&S Site Audits & Inspections completed by the H&S Team in 2025, consisting of:
  - o 19 site audits
  - o 10 Inhouse teams repairs and contractor sites
  - o 9 Major construction site

## Future Plans / Continuous Improvement

- This Statement, once published, will be shared with all colleagues along with additional guidance.
- We will enhance our supplier documentation to include a Supplier Code of Conduct.
- A new Contract Management toolkit is in development and will include reference to Modern Slavery within its guidance, templates and agendas for all contract managers to use.