



## Anti-Slavery and Human Trafficking Statement

Annual Update 1<sup>st</sup> April 2025- 31<sup>st</sup> March 2026

### Introduction from Kevin Rodgers, Chief Executive

This is the tenth annual Anti-Slavery and Human Trafficking Statement<sup>1</sup> and Citizen remains proud of the steps we have taken to combat slavery and human trafficking and remain committed to improving our practices in this area. I can confirm that we have received no reports of slavery or human trafficking in our business or with any of our wider supply chain partners.

Citizen and its partners remain committed to a zero-tolerance approach to modern slavery and human trafficking in its supply chains. We recognise our obligations in identifying, targeting and preventing slavery and human trafficking and we understand that everyone has a role to play to eliminate this.

Our approach to tackling slavery and human trafficking involves -

- Ensuring we have an up-to-date Anti-Slavery and Human Trafficking Policy.
- Training our staff to understand our policy and procedures for identifying and reporting modern slavery.
- We undertake due diligence in appointing contractors and suppliers.

It is for these reasons that we believe our working practices to be adequate and as such our statement remains similar to those issued in previous years.

Our previous statements will be available on request.

#### 1. Organisation's structure

Citizen undertakes a range of community and social based activities, including housing, regeneration, community development and care. We employ over 1,000 members of staff and manage more than 30,000 homes across Birmingham, Coventry, Herefordshire, Worcestershire and the wider West Midlands.

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<sup>1</sup> previous statements published as WM Housing Group Limited



We are a not-for-profit social housing business creating homes that are a foundation for life. We do however have Signature New Homes, who develop open market housing to subsidise the development of more affordable homes.

## 2. Our supply chains

As a registered provider we do not operate extensive, worldwide supply chains. Due to this, we can build close relationships with suppliers which enable us to promote our commitment with regards to slavery and human trafficking.

## 3. Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery in our supply chains or in any part of our organisation. As part of this, we have an Anti Slavery and Human Trafficking Policy which reflects our commitment to acting ethically and with integrity in all our business relationships, as well as implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. This policy was reviewed in May 2022, underwent an interim review in December 2023 and is due for a full review in July 2025. A copy of the policy can be found on our website.

Citizen's Procurement Policy underwent a full review in 2024/25 to ensure it's compliance with the new procurement act. The Procurement Team have undertaken work to prepare colleagues for the requirements of the Act including enhanced duties around reporting instances of modern slavery should a breach be identified.

Citizen recognises that modern slavery is not confined to supply chains and we see identifying modern slavery or human trafficking as part of our duty as a landlord and as an employer.

In 2024 it was reported that some major employers in the U.K. had been employing victims of modern slavery, failing to identify some key risk indicators such as the same bank accounts or addresses used for several employees. Following these reports, we checked our policies and processes, and we are confident in our payroll processes and reporting would identify such risks. Similar checks are also made for customer's account when issuing credit recharges.

We are an organisation that plays an active role in our communities and are often in a unique position to spot signs that may indicate a concern. We have policies and procedures in place to ensure that safeguarding concerns can be reported easily including

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a specific process for concerns relating to modern slavery. Colleagues who are based predominantly in our communities including engineers, estates services and grounds maintenance colleagues can now rapidly report concerns via their hand-held devices using a simple app. We have trained these colleagues to use our processes, and our Safeguarding Committee keeps the effectiveness of these process under review. A new suite of performance indicators has been developed and allow the Safeguarding Committee to have greater insight into modern slavery and other safeguarding issues.

All colleagues, regardless of role, must undertake some level of safeguarding training, this helps all staff to identify any safeguarding issues within our supply chains or in our homes and ensures they follow the correct referral procedures. We have Safeguarding Leads in all areas of the business who have enhanced levels of training to support them to spot signs of abuse that may indicate modern slavery.

#### **4. Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk we have in place systems to:

- identify and assess potential risk areas in our supply chains;
- mitigate the risk of slavery and human trafficking occurring in our supply chains;
- monitor potential risk areas in our supply chains; and
- protect whistle blowers via our Speak-Up Policy.

#### **5. Our risks and how we manage this**

As we are based in and operate solely within the UK, we have identified that as an organisation our exposure to the risk of slavery and human trafficking is low. However, as part of our ongoing process to identify and monitor risks we have identified that our key area of risk lies in our relationships with supply chains and contractors. Through the procurement process suppliers are required to share their Modern Slavery Statement or agree to comply with Citizen's, failure to do so will result in their exclusion.

#### **6. Supplier adherence to our values**

As an organisation we have a zero-tolerance approach to slavery and human trafficking. To ensure all those in our supply chain and any contractors comply with our values, we have in place a supply chain compliance programme. This consists of incorporating a standard clause into all our new agreements with suppliers and contractors which informs them of our commitment to combatting slavery and human trafficking and requires them to agree to this commitment when working with us.

We are committed to tackling modern slavery and human trafficking and want to work with suppliers who share this commitment.

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## 7. **Our effectiveness in combating slavery and human trafficking**

We use the following indicators to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our organisation or supply chains:

- recording and monitoring any incidents or reports made to us by staff in accordance with our Anti Slavery and Human Trafficking Policy using the mechanisms established in our Speak-Up Policy and Safeguarding Policy and Procedures.
- monitoring any incidents or allegations across our supply chains which conflict with our values; and recording any incidents or complaints received from any third parties concerning slavery and human trafficking.
- Provide the Safeguarding Committee with performance information on the safeguarding reports made including modern slavery.

## 8. **Training and awareness**

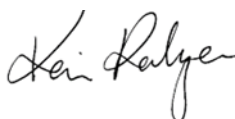
We understand that training is fundamental in our duty to ensure that there is no slavery or human trafficking in our business or supply chains. We continue to train and raise awareness amongst staff to help them better understand modern slavery and human trafficking as well as the risks associated with it and how as an organisation, we are working to manage this.

## 9. **Further steps – 2025/26**

We are committed to ensuring that our business and supply chains remain slavery and human trafficking free. During the year we will –

- Ensure there is continuous monitoring of our business and its supply chains to ensure we are free from slavery and human trafficking.
- Undertake a full review of the Anti-Slavery and Human Trafficking Slavery Policy.
- Review the training offer and identify any gaps.
- Implementation of Citizen’s new Procurement Policy and Strategy to ensure ongoing transparency and diligence.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2025.





Kevin Rodgers, Chief Executive  
Citizen Housing Limited  
Date: March 2025

## 10. VERSION CONTROL

VERSION	DATE	AMENDMENTS	APPROVED AT/BY	REVIEW
V10.0	March 2025	Annual update	Kevin Rodgers	March 2026
V9.0	March 2024	Annual update	Kevin Rodgers	March 2025
V8.0	March 2023	Annual update	Kevin Rodgers	March 2024
V 7.0	March 2022	Annual update	Kevin Rodgers	March 2023
V 6.0	March 2021	Annual update	Kevin Rodgers	March 2022
V 5.0	March 2020	Annual update and change to Citizen brand	Kevin Rodgers	March 2021
V 4.0	March 2019	Annual update	Kevin Rodgers	March 2020
V 3.0	March 2018	Annual update	Kevin Rodgers	March 2019
V 2.0	March 2017	Annual update	Kevin Rodgers	March 2018
V 1.0	March 2016	Annual update	Kevin Rogers	March 2017

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