

Modern Slavery and Human Trafficking Statement For the Financial Year Ending 31 March 2026

1. Introduction and Opening Statement

The merger of Bespoke Supportive Tenancies and Westmoreland Supported Housing on 1 December 2025, resulted in the formation of Portus Supported Housing (PSH), whose increased turnover now meets the criteria requiring it to formally report on its compliance with the Modern Slavery Act 2015. This statement is made in accordance with Part 6 Section 54 (1) of the Modern Slavery Act 2015 and constitutes Portus Supported Housing's (PSH) slavery and human trafficking statement for the financial year April 2025 to March 2026.

PSH is a charitable housing association registered society under the Co-operative and Community Benefit Societies Act 2014. We are also regulated by the Regulator of Social Housing. PSH leases 454 properties from real estate investment trusts and private landlords, which enables it to house 2404 tenants, who require a variety of care and support, which is provided by third parties. PSH established a property management subsidiary, Portus Property Management (PPM) in June 2025 but the company did not start trading until 1 April 2026. Prior to this date, all repairs and maintenance were still carried out by external contractors. Details of how PPM meets the requirements will be included in next year's statement.

PSH operates a zero-tolerance policy towards slavery and human trafficking and is committed to ensuring it doesn't occur in our supply chains or in any part of its business. This statement has the support and approval of the Board. Managers and staff are expected to report any evidence that slavery and human trafficking is taking place.

2. Organisational Structure, Business, and Supply Chains

PSH was formed from two, small lease-based supported housing associations and as the organisation have integrated, we have been working on ensuring that systems and processes are fit for purpose for a larger organisation. PSH operates entirely in the UK and almost exclusively in highly regulated sectors. PSH has contractual relationships with the care and support providers, who provide the support to our tenants. They in turn have contractual relationships with Local Authority and NHS Commissioners.

Other than in very rare circumstances, PSH sources all of its goods and services from UK based suppliers, particularly its repairs and maintenance services. During 2025/26, PSH and its legacy organisations used a single main contractor, Renov8, to undertake its repairs and maintenance activities, supported by a small number of specialist contractors for landlord health & safety compliance work and some of the planned investment works. PSH ensured that Renov8 had a modern slavery policy in place and took assurance from them that this was complied with.

3. Policies in Relation to Modern Slavery

PSH has developed a suite of policies that assist with identifying modern slavery and human trafficking, as well as establishing the environment for staff to raise concerns and have these concerns listened to.

- Code of Conduct – PSH has adopted the NHF’s Code of Conduct 2026 which requires staff and Board members to uphold the highest standards of probity and ethical behaviour.
- Whistleblowing Policy – this provides confidential reporting and communication channels to encourage staff to report any concerns or suspicions.
- Safeguarding Policy – this policy specifically references modern slavery and human trafficking as safeguarding issues to be identified and reported on, covering PSH’s accommodation, supply chain and staffing.
- Procurement Policy – this policy details the requirements that PSH has in relation to its procurement strategy, that includes significant contractors to comply with key PSH’s policies.

Further work is being undertaken in relation to policies. Following the establishment of a subsidiary, PSH policies are being reviewed to identify whether they need to be ‘Group’ policies or whether PPM needs to produce its own policies in specific areas. A recruitment and selection policy is being drafted and this will specifically cover the processes and checks to confirm that PSH and PPM comply with legislation around the recruitment and employment of all staff.

4. Risk Assessment and Management

PSH has currently assessed its risks in relation to failing to identifying modern slavery and human trafficking as low. PSH employed 66 staff at 31 March 2026 and went through a robust process, with staff re-applying for roles, as part of the merger and moving to a single office location. This process included Right to Work checks.

Although PSH is cognisant to the risks of tenancy fraud and cuckooing, with all tenants living in shared accommodation and having a dedicated support worker, the risks of these activities occurring in a PSH property are more limited. With the establishment of detailed policies and procedures and staff training in this area, PSH believes that it is managing these risks down to an acceptable level.

With managing just 2404 bedspaces, across 454 properties, PSH does not have a significant supply chain in terms of its repairs and maintenance contractors. PSH does not purchase any materials directly itself and has a small core of specialist contractors to support its main contractor, who uses a mixture of employed operatives and sub-contractors.

5. Due Diligence Processes

PSH is developing due diligence processes around employment and procurement to ensure that staff follow procedures and controls are operated.

The effectiveness of PSH’s processes in relation to modern slavery and human trafficking will be reviewed annually in preparation for the production of this statement. Consideration will also be given as to whether there are any suitable performance indicators that could be



reported to management, to evidence the effectiveness of PSH's processes, such as percentage completion of mandatory

6. Training and Awareness

PSH has implemented a mandatory e-learning programme for all staff. Safeguarding training has been provided to all frontline staff.

7. Board Approval and Sign-Off

This statement was discussed at PSH's Board meeting on 17 August and approved.



Jayne Francis-Ward
Chair – Portus Supported Housing
Date 17 August 2026

