



torus

Modern Slavery Act Statement 2025/26

LGL-POL-06-06

0.	DOCUMENT CONTROL		
0.1	SUMMARY		
	This document is the Torus Group Annual Modern Slavery Act Statement		
0.2	DOCUMENT INFORMATION		
Role	Name/Position	Date	
Author	Catherine Fearon	July 2024	
Approved by	Torus (Group) Board	August 2024	
Document Reference			
0.3	DOCUMENT STATUS HISTORY		
Version	Date	Change owner	Reason for Update
1	Nov- 2019	Catherine Fearon	Annual review
2	July – 2021	Ronnie Clawson	Annual review
3	July 2022	Catherine Fearon	Annual Review
4	July 2023	Catherine Fearon	Annual Review
5	July 2024	Catherine Fearon	Annual Review
6	July 2025	Catherine Fearon	Annual Review
0.4	DOCUMENT REVIEW DATE		
Review Due	July 2026		
Responsible Officer	Catherine Fearon, Legal Counsel & Company Secretary		
0.5	DISTRIBUTION		
Name / Department	Title		
Torus Group	All staff		
0.6	ASSOCIATED DOCUMENTS		
Ref: PCT-POL-01-02	Title: Procurement Policy		
Ref: SCO-PRC-22-02	Title: ABC Respond Procedure		
	Employee Code of Conduct		
	Board Member Code of Conduct		

Contents

- 1. Complying with the Modern Slavery Act 2015**
- 2. Supply Chain**
- 3. Customers**
- 4. Torus Group as an employer**
- 5. Training and awareness**
- 6. Compliance**
- 7. Governance**

1. Complying with the Modern Slavery Act 2015

The Government has introduced new measures to strengthen the Modern Slavery Act 2015 and ensure that large businesses and public bodies tackle modern slavery risks in supply chains. It is now a requirement for organisations with a turnover of £36 million or more to publish their modern slavery statements on a new digital government reporting service and Torus62 Limited (Torus) will comply with the requirement.

This statement covers our current position on modern slavery and sets out how Torus62 Limited and its subsidiaries (HMS, Torus Developments and Torus Foundation) ensure that slavery and human trafficking does not occur in any part of its business or supply chain.

The Group consists of:

- Torus62 Limited, a Registered Provider (RP) of social housing, serving customers across the North West of England with approx. 40,000 homes offering a blend of social and affordable rent, home ownership and outright sale properties. It is incorporated as a Community Benefit Society, registered with the Financial Conduct Authority and is registered with the Regulator of Social Housing under the Housing Act.
- HMS are commercial, wholly owned subsidiary (100% shareholding to Torus62 Limited) providing construction and repairs and maintenance services to Torus and to third party organisations.
- Torus62 Developments Limited is a wholly owned subsidiary (100% shareholding to Torus62 Limited) and delivers new homes across the North West.
- Torus Foundation is a company limited by guarantee; it is a registered charity and a wholly owned subsidiary of Torus62 Limited.

All employees within the above group structure work in UK.

2. Supply Chain

We do not have any direct supply chain outside of the UK. We have a professionally qualified Procurement Team and a Procurement Policy which requires a robust procurement process including appropriate due diligence to ensure we engage with reputable suppliers and subcontractors who adhere to relevant legislation and regulation and are not subject to any investigation.

Our Procurement Strategy adopts a robust approach to ensure that modern slavery risks are appropriately identified and mitigated. We include Modern Slavery questions for all tenders and require supply chain information to be provided for procurements of works, goods, and services designated as having a high risk of modern slavery, i.e., construction, workwear, ICT hardware, security services, cleaning and catering. This is aligned to Cabinet Office Procurement Policy Note 009 and the Procurement Act, which provides stronger powers to exclude suppliers where there is sufficient evidence of modern slavery within their supply chains.

We conduct ongoing compliance monitoring post contract award to ensure contracted suppliers comply with relevant legislation and regulation including the Modern Slavery Act. This is supported by our supplier compliance software 'Constructionline'. We will only conduct business with organisations who fully comply with this statement, the terms of contracts or those who are taking verifiable steps towards compliance.

3. Customers

Some of our customers are vulnerable to modern slavery and we have a part to play in keeping our customers safe in their homes. We have an 'ABC' reporting approach to safeguarding, and it is everyone's responsibility to ensure concerns over modern slavery and safeguarding is reported and dealt with.

Torus Group has robust safeguarding policies and procedures for both adults and children. This is supported by an ABC Respond process which enables safeguarding alerts to be raised easily and efficiently by any Torus Group colleague. Torus also operates with an internal meeting structure which is solely dedicated to Safeguarding, and this is reported within the overarching governance framework.

4. Torus Group as an employer

Torus and its subsidiaries review terms of employment regularly to ensure they comply with all relevant legislation. We feel there is a very low risk of slavery or human trafficking within our business. With agency staff, we use reputable suppliers, and we have policies and procedures designed to mitigate any risks. Torus carry out 'the right to work in the UK' as required to minimise exploitation.

Relevant policies may include (but are not limited to);

- Anti-bribery
- Anti-fraud
- Safeguarding
- Recruitment
- Tenancy Fraud
- Whistleblowing
- Diversity and inclusion
- Code of Governance
- Employee Code of Conduct & Probity Policy
- Board Code of Conduct

All policies and procedures are available to staff, and some are published on our website. We will continue to review and update policies and procedures where necessary to ensure there is no slavery and human trafficking within our business.

5. Training and awareness

We are aware that the sector in which we operate has vulnerable persons who may be exposed to slavery and human trafficking. We operate under robust safeguarding procedures (Adult & Child Safeguarding) and training is mandatory for all employees.

We have increased our safeguarding training and awareness with mandatory training across the Group and strengthened our message with internal communication around this subject.

We will continue to engage with our employees, customers and Board and be vigilant and continue to provide training to employees and, if appropriate, our suppliers.

Torus Group will continue to raise awareness and understanding across the organisation of the risk of slavery and human trafficking.

Anti-Slavery day (18 October) provides an opportunity to raise awareness of human trafficking and modern slavery, and we may mark the day with communication and awareness-raising throughout the Group and our supply chain to highlight good practice and focus attention where improvements may need to be made.

6. Compliance

We have not identified any breaches of the Act in the financial year 2024/25.

7. Governance

Responsibility for this statement sits with our Group Board and the leadership team. This statement is made under section 54(1) of the Modern Slavery Act 2015. It constitutes our Group's slavery and human trafficking statement for the financial year ending 31st March 2024. This statement applies to all subsidiaries within the Torus Group and has been approved by the Torus Group Board.

This statement will be reviewed and updated on an annual basis.



Signed:

Steve Coffey
Group Chief Executive
On behalf of the Torus Group Board