Appendix A: Modern Slavery Act Statement 2024

Eastlight Community Homes is a community benefit society (*as defined by the Co-operative and Community Benefit Societies Act 2014*) that has adopted the community gateway model. As a community gateway association, we are committed to both empowering our customers and actively supporting the communities within which we operate. This includes a commitment to being vigilant and doing what we can to combat modern slavery and prevent human trafficking from affecting our business and supply chain. We take a proactive role in our communities, being vigilant and acting wherever we suspect slavery, human trafficking or other forms of exploitation. This applies to our operations and our contractors.

Our desire is to have a positive impact on the fair and safe working conditions of those working directly or indirectly for us and we expect our suppliers/contractors to support this. We have a framework of policies, procedures and contractual requirements in place which contribute towards the prevention of slavery or human trafficking within our organisation and our supply chains. These include but are not limited to areas such as housing management, safeguarding, recruitment, whistleblowing, procurement, terms and conditions and codes of conduct for staff, suppliers and contractors. Due diligence is conducted, and detailed checks are made when recruiting staff (for example, checking their right to work in the UK and carrying out Disclosure and Barring Service checks) and in engaging suppliers or contractors.

We seek to only trade with those who comply with the Modern Slavery Act 2015 ('the Act'). We have assessed the risk of our partners not complying with the Act and have taken the following steps to ensure our suppliers are equally vigilant with respect to human trafficking and modern slavery practices:

- Tender documents include the right to terminate the agreement if anywhere within the supply chain there is evidence of:
    - Child labour
    - Slavery, Forced, Bonded or Involuntary labour
    - Human Trafficking and Exploitation
- Terms and conditions state that the supplier warrants that it has not:
    - committed any offence involving slavery or human trafficking; and
    - not been the subject of any investigation, inquiry or enforcement proceedings regarding any offence, or in connection with, slavery or human trafficking.

We shall only allow inclusion onto our supplier list where suppliers have signed a declaration that they are not involved in modern slavery or human trafficking. We continue to monitor risks regarding modern slavery and human trafficking and will take appropriate action if we suspect any non-compliance with the Act or our terms and conditions.

In addition, much of our work in the community potentially brings us into contact with issues associated with modern slavery, such as

- People taking illegal control of (known as “cuckooing”) one of our properties. This is often for drug purposes but can also be for cheap / free living accommodation
- Young people being coerced into drug dealing and/or county lines involvement
- Properties being used as brothels

We proactively encourage all our staff to be aware of these risks. In particular, Eastlight has become aware that since July 2023 an accommodation centre in Wethersfield, Braintree Essex has been housing asylum seekers (operational until 2027). As a potentially vulnerable group, asylum seekers may be at risk of modern slavery and therefore Eastlight is mindful of this situation within its operational area and the associated risks.

We have safeguarding and whistleblowing policies, procedures, and guidance in place to support reporting, investigating and tackling modern slavery activity. We ensure all employees are aware of those policies, and we deliver safeguarding training to all employees, our Board & Committee members and our contractors. We monitor relevant incidents and include these in our annual reporting to Board.

This statement is made under section 54(1) of the Modern Slavery Act 2015 and was approved by the Board of Management on 30 July 2024 and is reviewed annually.