

Modern Slavery Act Statement 2026

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 empowering our customers and actively supporting the communities in which we operate. This includes a clear commitment to combatting modern slavery in all aspects of our business and supply chains.

We are vigilant in identifying, preventing, and responding to risks of modern slavery. This applies across our operations and those of our contractors, partners and suppliers. Our aim is to ensure fair, safe and legal working conditions for anyone working either directly or indirectly for Eastlight.

Our approach

We have a framework of policies, procedures and contractual expectations in place that help prevent slavery and human trafficking. These span key areas such as:

- Housing management, Operatives and Tenancy Safeguarding
- Recruitment, employment and onboarding procedures
- Whistleblowing and confidential reporting
- Procurement and supply chain management
- Terms and conditions, including codes of conduct for staff, suppliers and contractors

All Eastlight employees, Board and Committee members receive safeguarding training, which includes awareness of modern slavery risks. This is refreshed regularly.

Training and awareness continue to be strengthened to ensure colleagues and partners are able to recognise the signs of modern slavery and understand how to report concerns.

Due diligence is conducted when recruiting staff (for example, checking their right to work in the UK and carrying out Disclosure and Barring Service checks) and when engaging suppliers or contractors.

Responsibility for Eastlight's response sits with the Executive Leadership Team, with oversight provided through internal assurance arrangements and annual review by the Board.

In the past 12 months

- One case raised internally was initially flagged as a potential modern slavery incident; after review, it was classified as a safeguarding concern and referred to the appropriate external agency.
- No confirmed incidents of modern slavery were identified across our business or supply chain.
- **Reporting and oversight have been strengthened, with activity now monitored more regularly through internal assurance arrangements.**

Measuring effectiveness

Eastlight monitors the effectiveness of its approach through safeguarding reporting, training activity, supplier due diligence processes and internal assurance arrangements. Information is reviewed periodically to identify emerging risks, monitor compliance and support continuous improvement in our response to modern slavery.

Due diligence and supply chain management

We recognise that development and construction supply chains carry higher risks of modern slavery and labour exploitation, particularly due to the use of subcontractors and temporary labour. To address this, we:

- Require suppliers to confirm compliance with Eastlight's Modern Slavery expectations through procurement and onboarding processes, including declarations relating to child labour, forced labour, human trafficking and exploitation. Additional declarations may be required depending on the nature and value of the procurement activity.
- Include contractual clauses allowing for termination if modern slavery or related offences are identified

Following internal review, our approach to supply chain management is being strengthened to ensure risks are considered throughout the lifecycle of contracts, including greater focus on contractor and subcontractor oversight.

When acquiring properties or entering into new management agreements, Eastlight conducts due diligence which includes consideration of safeguarding risks and potential exposure to modern slavery.

Operational activity and safeguarding

Our frontline housing teams play a vital role in identifying safeguarding concerns that may relate to modern slavery. During visits carried out by our My Eastlight Team and Repairs

Teams—including welfare checks, tenancy visits, repairs and property inspections—staff are aware to record and report any concerns.

Staff are encouraged to remain vigilant for indicators that could be related to modern slavery, such as:

- Unusual patterns of occupancy
- Signs of coercion or individuals not freely engaging with staff
- Physical indicators of neglect or illegal activity
- Individuals having limited control over personal documentation

These checks act as an important community-based safeguard. Any concerns are referred to safeguarding leads for review and, where appropriate, onward referral to relevant authorities.

Our work also requires awareness of risks such as:

- “Cuckooing” of properties
- Coercion into county lines activity
- Use of homes for exploitation

Local context

In July 2023, the asylum accommodation centre in Wethersfield, Braintree began housing asylum seekers and remains operational. We recognise that individuals accommodated at the site may be vulnerable to exploitation.

Recent updates from local partners confirm that the site continues to operate below its standard capacity, with an average length of stay of around 90 days and individuals moved on to dispersal accommodation across the UK when appropriate.

There has also been an increase in community tensions since late 2025, including local protests, which reinforces the importance of continued safeguarding awareness within the wider community.

Whilst Eastlight is not responsible for managing the site, we remain alert to associated risks within our operating area.

Statement approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and was approved by the Eastlight Community Homes Board on 30th July 2026.

It will be reviewed annually.