

## Modern Slavery and Human Trafficking Policy (Housing)

<b>Policy Name:</b>	Modern Slavery and Human Trafficking Policy (Housing)
<b>Version:</b>	V.1
<b>Approved by:</b>	<i>The Board of Management</i>
<b>Approved date:</b>	17th November 2025
<b>Next review date:</b>	17th November 2026
<b>Key Legislation and Regulations:</b>	Modern Slavery Act 2015 Human Rights Act 1998 Social Housing (Regulation) Act 2023 Equality Act 2010 UN Guiding Principles on Business and Human Rights Oakfield aligns with guidance from the Home Office, Gangmasters and Labour Abuse Authority (GLAA), and sector best practice
<b>Relevant Policies:</b>	Whistleblowing Staff Training Safeguarding EDI
<b>EA:</b>	Equality Analysis is currently under review
<b>DPIA:</b>	DPIA is currently under review
<b>Consultation:</b>	Board of Trustees
<b>Applies to:</b>	All Tenants, employees and volunteers

### 1. Policy Statement

Oakfield Easton Maudit Ltd has zero tolerance for modern slavery and human trafficking in any form. We are committed to ethical operations, safeguarding vulnerable individuals, and ensuring our supply chains and housing services are free from exploitation. We recognise that modern slavery and trafficking can affect anyone—regardless of age, gender, nationality, or background—and we take proactive steps to prevent, identify, and respond to such risks.

### 2. Purpose

This policy aims to:

- Prevent modern slavery and human trafficking in Oakfield's operations and supply chains
- Ensure staff, volunteers, and contractors understand their responsibilities
- Provide clear procedures for identifying, reporting, and responding to concerns
- Promote transparency, ethical procurement, and safeguarding practices

### 3. Scope

This policy applies to:

- All Oakfield staff and volunteers
- Contractors and suppliers
- Tenants

It covers all housing settings, procurement activities, recruitment processes, and community engagement.

#### 4. Definitions

Oakfield recognises the following forms of exploitation under the Modern Slavery Act 2015:

- Forced Labour - Work or services performed under coercion or threat
- Debt Bondage - Being forced to work to repay a debt under unfair conditions
- Domestic Servitude - Exploitation in private households with restricted freedom
- Sexual Exploitation - Coerced or forced sexual activity, including trafficking for sexual purposes
- Human Trafficking - The recruitment, transportation, transfer, harbouring or receipt of persons by means of threat, force, coercion, or deception for the purpose of exploitation

#### 5. Risk Areas

Oakfield identifies the following areas as potential risk zones:

- Procurement of goods and services (e.g. cleaning, maintenance, construction)
- Recruitment and labour practices (e.g. agency staff, subcontractors)
- Vulnerable tenant populations (e.g. migrants, individuals with limited English or support networks)
- Community partnerships and third-party service providers

#### 6. Reporting Procedure

All concerns must be reported immediately.

Oakfield follows a three-step process:

- Report - Concerns should be raised with the Designated Safeguarding Lead (DSL) or a senior staff member

Document - A factual record must be created, including:

- Date, time, and nature of concern
- Names of individuals involved
- Actions taken and who was notified

Escalate - Where necessary, concerns are escalated to:

- Local authority safeguarding teams
- Police or emergency services
- GLAA or National Referral Mechanism (NRM)
- Charity Commission or RSH (for serious incidents)

All disclosures are treated with sensitivity and confidentiality, in line with Oakfield's Data Protection Policy.

#### 7. Roles and Responsibilities

Role	Responsibility
DSL	Coordinates response, liaises with external agencies, maintains records
Trustees	Ensure policy compliance, receive serious incident reports

Staff and Volunteers	Attend training, report concerns, follow procedures
Contractors and Suppliers	Comply with Oakfield's ethical standards and contractual clauses

## 8. Training and Awareness

Oakfield ensures:


- Mandatory modern slavery and trafficking awareness training for all personnel
- Annual refresher training and updates on legislation and best practice
- Supplier contracts include anti-slavery and trafficking clauses
- Incident reviews are used to improve practice and prevent recurrence

## 9. Transparency and Governance

- Oakfield publishes an annual Modern Slavery Statement in line with statutory requirements
- Procurement processes include due diligence and ethical sourcing checks
- The Board receives regular reports on compliance, incidents, and risk assessments

## 10. Monitoring and Review

- Any incidents are logged and reviewed regularly by Housing Officer and Managing Director
- The Board receives regular reports and approves policy updates
- This policy is reviewed annually or following significant changes in legislation or practice

<b>Signed - Chair of Trustees:</b>	
<b>Print:</b>	Mrs Sara Morrison
<b>Date:</b>	17 <sup>th</sup> November 2025