

Eastlight Community Homes

Modern Slavery Act Statement 2025

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 and human trafficking 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 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.

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.

Responsibility for our modern slavery response sits with our Executive Leadership Team, with an annual review presented to Governance and People Committee and 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.
- Internal reporting frequency was increased to quarterly to improve oversight.

Due Diligence: 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 all new suppliers to provide evidence of their compliance with the Modern Slavery Act during the tender process
- Include contractual clauses allowing for termination if modern slavery or related offences are identified in the supply chain

While these controls are in place, we acknowledge that our current monitoring is still developing. Procurement will play a central role in strengthening supplier compliance checks in 2025/26.

When acquiring properties or entering into new management agreements, Eastlight conducts due diligence which now includes consideration of safeguarding risks and modern slavery exposure. This is particularly important in acquisitions involving supported housing or tenant transfer arrangements.

Our frontline housing teams also play a vital role in identifying safeguarding concerns that may relate to modern slavery. During visits carried out by our Housing Team—including welfare checks, safeguarding checks, tenancy visits, repairs, property inspections, and welcome visits (new tenancy checks)—all staff are aware to record and report any signs back to the Safeguarding inbox. Staff are encouraged to remain vigilant for indicators that could be related to modern slavery, such as:

- Unusual patterns of occupancy (e.g. evidence of multiple occupants not on the tenancy)
- Signs of coercion or individuals not freely engaging with staff
- Physical indicators of neglect or illegal activity (e.g. evidence of drug use)
- Few or no documents, or someone else in control of their documents/passport

These frontline checks act as a key community-based safeguard. Housing officers and contractors are trained to refer any concerns to safeguarding leads for review and, if appropriate, onward referral to relevant authorities.

Much of our community-facing work exposes us to indicators of modern slavery. We train staff to be aware of issues such as:

- “Cuckooing” of properties for drug or trafficking activities
- Coercion of young people into county lines drug networks
- Use of homes as sites of sexual exploitation

In July 2023, the asylum accommodation centre in Wethersfield, Braintree began housing asylum seekers. Following an extension granted by the Home Office in April 2024, the site

remains operational until at least 2027. With up to 800 residents and surge capacity for 420 more, we recognise the high vulnerability of this population to exploitation.

Mental health concerns, reports of self-harm, and limited legal access were documented in early 2024. While Eastlight is not operationally responsible for this site, we remain engaged and alert to associated risks within our broader housing and community responsibilities.

We have safeguarding and whistleblowing policies, procedures, and guidance in place to support reporting, investigating, and tackling modern slavery activity. These policies are embedded in our corporate training and culture.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and was approved by the Eastlight Community Homes Board of Management on 29 July 2025. It will be reviewed annually.