

Modern Slavery Policy

Author:	Zaiba Qureshi		
Responsible Executive:	Chief Executive		
Ratifying Authority:	Executive Team	Date ratified:	July 2026
Date of previous review:	None	Date of next review:	August 2029
Details of Consultation Internal and External:	Executive Team		
Equality Impact Assessment:	Yes	Date conducted: 30/07/2026 Conducted by: Theodora Ugo	
	Results: No negative impact		
Status	Final		
Frequency of Review	This policy will be reviewed at least every three years, or sooner following significant legal, regulatory, guidance, procurement, safeguarding, organisational or risk changes. Reviews will use learning from incidents, audits, complaints, supplier reviews and safeguarding activity.		
Version No.	1		
File path	Modern day slavery policy 2026		
Related Policies	• Procurement Strategy • Safeguarding Adults • Safeguarding Children • Whistleblowing Policy • DBS (Disclosure and Barring Service) Policy		
Appendices	• Modern Day Slavery Statement for Website • Summary of Changes to last version		

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1. Introduction and rationale to policy

The Modern Slavery Act 2015 is the principal legislation for England and Wales, covering slavery, servitude, forced or compulsory labour and human trafficking. It strengthens prosecution powers and victim protection and requires relevant commercial organisations to publish an annual transparency statement under section 54 where the statutory turnover threshold is met. Although Housing for Women is not currently required to publish a statutory statement if it remains below the £36 million turnover threshold, this policy adopts the Act and Home Office Transparency in Supply Chains guidance as good practice.

This policy covers modern slavery risks across Housing for Women's operations, services, procurement, contract management, recruitment, housing management, supported housing and safeguarding. It should be read with related safeguarding, whistleblowing, recruitment, procurement, tenancy fraud, health and safety, equality, diversity and inclusion, and data protection policies. It supports a victim-centred, trauma-informed and partnership-based response.

2. Policy Statement

This policy applies to everyone working for, with, or on behalf of Housing for Women, including employees, Board and committee members, contractors, agency workers, consultants, volunteers, interns, partners, managing agents, suppliers and organisations delivering services to residents or service users on our behalf.

It is particularly relevant to procurement, contract management, repairs and maintenance, housing management, supported housing, safeguarding, HR, recruitment, volunteering, finance and governance.

Housing for Women will take proportionate steps to prevent, identify and respond to modern slavery by embedding due diligence in procurement, contract management, recruitment, tenancy management, safeguarding and service delivery. Concerns must be escalated promptly through safeguarding, line management, whistleblowing or emergency routes.

3. Definitions

- Modern slavery means slavery, servitude, forced or compulsory labour and human trafficking. It includes exploitation a person cannot refuse or leave because of threats, violence, coercion, deception, abuse of power, debt bondage, control of identity documents, isolation or other vulnerability.
- Human trafficking involves arranging or facilitating another person's travel, transfer, harbouring or receipt for exploitation, including forced labour, domestic servitude, criminal or sexual exploitation, forced begging, benefit fraud, forced marriage, organ removal or other abuse.
- A victim-centred approach prioritises safety, dignity, informed choice, confidentiality and appropriate referral, recognising that victims may be controlled, frightened or reluctant to disclose abuse.

Article 3 of the Protocol defines trafficking as:

(a) *"Trafficking in persons" shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of*

organs;

For the full definition consult the Protocol.

4. Policy

Housing for Women is committed to preventing modern slavery and human trafficking in its operations, services and supply chains. We will act ethically, promote fair work and safe employment, and take proportionate action where risks are identified.

Key risk areas include procurement, contract management, repairs, cleaning, security, agency staffing, recruitment, supported housing, safeguarding, domestic abuse services, tenancy fraud, cuckooing, unlawful subletting, resident or service user exploitation, and property misuse. Risks may increase where people experience insecure immigration status, domestic abuse, homelessness, poverty, mental ill health, substance misuse, isolation, language barriers or other vulnerability.

General Needs accommodation provided by us could be a potential venue for modern slavery through unlawful subletting or unauthorised assignment (passing a tenancy on to another party without H4W's permission) or general misuse of the tenancy agreement by an existing tenant.

Although Housing for Women's supply chains are mainly UK-based and service-led, risks may arise through labour-intensive services, subcontracting, agency labour, facilities management, construction, repairs, cleaning, security, technology hardware, textiles, PPE and other higher-risk goods or geographies. Procurement and contract management must assess risk rather than assume low exposure.

Housing for Women will manage modern slavery risk through proportionate due diligence, training, reporting, contract controls, safeguarding and continuous improvement. Measures include:

- Requiring relevant suppliers to confirm their modern slavery approach, provide a statement where legally required, and comply with Housing for Women's standards.
- Using risk-based procurement checks, including supplier questionnaires, exclusion checks, contract clauses, performance monitoring and enhanced due diligence for higher-risk contracts.
- Ensuring recruitment and agency processes include right to work, safer recruitment, required DBS checks and checks against unlawful fees or exploitative conditions.
- Providing induction and refresher training on recognising indicators, responding safely and reporting concerns.
- Embedding modern slavery indicators into safeguarding, housing management and supported housing practice, including cuckooing, coercion, debt bondage, domestic servitude, criminal exploitation and property misuse.
- Maintaining clear reporting routes through line management, safeguarding leads, whistleblowing, the Modern Slavery Helpline, police or emergency services where there is immediate risk.
- Reviewing incidents, concerns, supplier responses and training completion to identify learning and strengthen controls.

4.1 Compliance with the policy

- Read, understand and comply with this policy and complete required training.

- Prevent, identify and report modern slavery concerns in our operations, services and supply chains.
- Raise suspected modern slavery promptly with your manager, safeguarding lead, HR, Procurement or through the Whistleblowing Policy, as appropriate.
- Where there is immediate danger or urgent risk to a child or adult at risk, contact emergency services and follow safeguarding procedures.
- Do not confront a suspected perpetrator or increase risk to a potential victim. Seek advice and record concerns factually and securely.
- If unsure, seek advice from your manager, safeguarding lead, HR, Procurement or the Modern Slavery Helpline.

5. References

- Modern Slavery Act 2015, including section 54 on transparency in supply chains
- Home Office Transparency in Supply Chains statutory guidance, updated 2025
- Procurement Act 2023, Procurement Regulations 2024 and current public procurement guidance on tackling modern slavery in supply chains, where relevant.
- Regulator of Social Housing Consumer Standards, including safety, transparency, fairness, tenancy and neighbourhood management, and accountability.
- Relevant safeguarding children and adults legislation, statutory guidance and local multi-agency procedures.

6. Further information

1. Hope for Justice

Website: <http://hopeforjustice.org/>

UK contact

Hope for Justice, P.O. Box 5527, Manchester, M61 0QU

Telephone: 0300 008 8000

Email: info.uk@hopeforjustice.org

Office hours: Monday to Friday, 9am to 5.30pm UK time. For advice on survivor care:

advocacy.advice@hopeforjustice.org

2. ECPAT UK (Every Child Protected Against Trafficking)

Website: <https://www.ecpat.org.uk>

General enquiries: info@ecpat.org.uk or 020 7607 2136. **Young person trafficking referrals:** youth@ecpat.org.uk. **Address:** ECPAT UK, Family Action, 34 Wharf Road, London N1 7GR.

3. Modern Slavery & Exploitation Helpline: 08000 121 700 or <https://www.modernslaveryhelpline.org/>

Appendix 1 – Modern Slavery statement for website

Modern Slavery Statement – July 2026

Housing for Women is committed to preventing modern slavery and human trafficking in our operations, services and supply chains. We act ethically, promote fair work and take proportionate action where risks are identified.

This statement summarises the steps we take to prevent, identify and respond to modern slavery risks. It reflects the Modern Slavery Act 2015 and Home Office Transparency in Supply Chains guidance.

Housing for Women is not currently required to publish a statutory statement if it remains below the £36 million turnover threshold, but publishes this statement as good practice.

Our organisation, supply chains and risks

Housing for Women is a housing association and charity providing homes and support services for women and their families. Our supply chains are mainly UK-based and service-led, covering areas such as repairs, maintenance, cleaning, security, agency staffing, facilities management, construction, technology and professional services.

Key modern slavery risks include labour-intensive services, subcontracting, agency labour, procurement, recruitment, supported housing, safeguarding, domestic abuse services, tenancy fraud, cuckooing, unlawful subletting, exploitation of residents or service users, and property misuse. Risks may increase where people experience domestic abuse, homelessness, poverty, insecure immigration status, mental ill health, substance misuse, isolation or language barriers.

Policies, due diligence and training

Our Modern Slavery Policy applies to everyone working for, with, or on behalf of Housing for Women. It is supported by our safeguarding, whistleblowing, recruitment, procurement, tenancy fraud, health and safety, equality, diversity and inclusion, and data protection policies.

- risk-based supplier checks, contract clauses, monitoring and enhanced due diligence for higher-risk contracts;
- right to work, safer recruitment, DBS and agency checks where required;
- modern slavery awareness through induction and refresher training for relevant colleagues;
- victim-centred, trauma-informed safeguarding and housing management practice; and
- reviewing incidents, concerns, supplier responses and training completion to strengthen controls.

We monitor effectiveness through policy review, safeguarding activity, procurement and supplier checks, contract monitoring, training completion, incident reporting, whistleblowing, complaints, audits and learning from concerns raised.

Reporting concerns

Anyone who suspects modern slavery or human trafficking should raise the concern promptly through Housing for Women's safeguarding, line management or whistleblowing routes. Where there is immediate danger, or urgent risk to a child or adult at risk, emergency services should be contacted without delay.

For independent advice or to report a concern, contact the Modern Slavery & Exploitation Helpline on 08000 121 700 or visit www.modernslaveryhelpline.org.

Review and approval

This statement has been approved by Housing for Women's Executive Team and will be reviewed annually, or sooner following significant changes in legislation, guidance, organisational activity or identified risk.

Signed: Zaiba Qureshi, Chief Executive

Date: July 2026

APPENDIX 2 SUMMARY OF UPDATES – JULY 2026

Area updated	Summary of change
Legislation and guidance	Updated references to the Modern Slavery Act 2015, section 54 and current Home Office Transparency in Supply Chains statutory guidance.
Scope	Expanded the policy to cover Board members, contractors, suppliers, volunteers, partners, procurement, contract management, recruitment, safeguarding, housing management and supported housing.
Good practice	Added victim-centred, trauma-informed and partnership-based principles, with clearer reporting routes and safeguards against increasing risk to potential

	victims.
Housing association risks	Added specific housing-related risks including cuckooing, unlawful subletting, tenancy fraud, property misuse, exploitation of residents and service users, repairs, maintenance, cleaning, security and agency labour.
Procurement and supply chains	Strengthened supplier due diligence, exclusion checks, contract clauses, monitoring and enhanced checks for higher-risk contracts.
Recruitment and workforce controls	Updated requirements for right to work, safer recruitment, DBS checks where required, agency checks and prevention of exploitative recruitment practices.
Training and reporting	Added induction and refresher training, modern slavery indicators, escalation routes, emergency reporting and use of the Modern Slavery Helpline.
Review and assurance	Updated the review clause to require earlier review following legal, regulatory, safeguarding, procurement or risk changes, and to use learning from incidents, audits and supplier reviews.