



Anti-Slavery and Human Trafficking Policy

1.0 Introduction

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour, and human trafficking; all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2 We have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. We implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.3 We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the [Modern Slavery Act 2015](#).

We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect that our suppliers will hold their own suppliers to the same high standards.

2.0 About this Policy

- 2.1 This Policy:
 - a) Sets out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking; and
 - b) Provides information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.

2.2 This Policy applies to all persons working for us or on our behalf in any capacity, including:

- Employees at levels
- Board, Committee, Subsidiary and Resident Governance Members
- Agency workers
- Seconded workers
- Volunteers
- Interns
- Agents
- Contractors
- External consultants
- Third-party representatives
- Business partners.

2.3 This Policy does not form part of any employee's contract of employment, and we may amend it at any time.

2.4 The terms 'you' and 'your' in this Policy mean all those listed in 2.2. The terms 'we', 'our' and 'us' mean Southern Housing.

3.0 Responsibility for the Policy

3.1 The Board has overall responsibility for ensuring this Policy complies with our legal and ethical obligations. The Executive Team has responsibility for ensuring that all employees comply with this Policy.

3.2 The Modern Slavery Working Group has primary and day-to-day responsibility for:

- Implementing this Policy
- Monitoring its use and effectiveness
- Dealing with any queries about it
- Auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

3.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy and are given adequate training on the issue of modern slavery.

4.0 Your responsibilities and how to raise a concern

4.1 You must ensure you read, understand and comply with this Policy.

- 4.2 All those working for us or with whom we have a relationship are responsible for the prevention, detection, and reporting of modern slavery in any part of our business or supply chains. You are required to avoid any activity that might lead to, or suggest, a breach of this Policy.
- 4.3 You must notify your manager or the Safeguarding Team as soon as possible if you believe or suspect a breach of this policy has occurred or may occur in the future.
- 4.4 You must raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 4.5 If you believe or suspect a breach of this Policy has occurred, or that it may occur, you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.
- 4.6 If you are unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Safeguarding Team.
- 4.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe you have suffered any such treatment, you should inform the Safeguarding Team immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Policy and Procedure which can be found on the intranet.

5.0 Training and communication

- 5.1 Training on this Policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.
- 5.2 We communicate our zero-tolerance approach to modern slavery in our business and supply chains to all suppliers, contractors, and business partners at the

outset of our business relationship with them. We reinforce this message as appropriate on an ongoing basis.

6.0 Breaches of this Policy

- 6.1 Any employee who breaches this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 6.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this Policy.

7.0 Review

- 7.1 We will review this Policy to address legislative, regulatory, best practice or operational issues

Controls

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