

POLICY DOCUMENT CONTROL

Commentary	Policy
Document Title	Anti-Slavery & Human Trafficking Policy
Description	<p>Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers, including children. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.</p> <p>This policy is to ensure that there are effective systems and controls in place consistent with our obligations under the Modern Slavery Act 2015.</p>
Location of document Link	"C:\Users\dubidatj\OneDrive - Nehemiah Housing\Corporate - NEW\Committee Papers\Audit & Risk\Audit & Risk 2024\A&R 05.09.24\Anti-Slavery and Human Trafficking Policy .docx"
Published/Definitive Version No.	3.0
Adoption Date	08/2022
Review Date	05/09/2024
Next Review Due	09/2025
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Consultation with (i.e., Exec, committee)	Executive Committee
Reviewing Committee Prior to Board	Audit & Risk – 07/09/2023
Approving Body	The Board
Approval Date	October 2023
Readership/Audience	All Staff working for and on behalf of Nehemiah HA
Information/Governance Classification (Restricted/unrestricted Access)	Unrestricted

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Policy Statement

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers, including children. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

Nehemiah Housing has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015.

Nehemiah Housing also expects the same standards from all its suppliers, contractors, and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery and expects that its suppliers will in turn hold their own suppliers to the same standards.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many ways. There is a spectrum of abuse, and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in the work environment. Therefore, supported by training our staff will be better placed consider instances where there may be a cause for concern which will be discussed internally with appropriate line management in terms of what the best course of action might be.

In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, Nehemiah Housing accepts that it has a responsibility through practical and reasonable due diligence processes – i.e., procurement of new contractors, to ensure that workers are not being exploited, that they are safe, and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

This policy applies to all individuals working for Nehemiah Housing or on Nehemiah Housing's behalf in any capacity, including employees, directors, officers, agency workers, volunteers,

agents, contractors, consultants, and business partners. However, where a contractor or supplier does not have the capacity to develop its own Anti-Slavery and Human Trafficking Policy, we would encourage the adoption of Nehemiah's policy.

Responsibility for the Policy

The Board of Directors has overall responsibility for ensuring that this policy complies with Nehemiah Housing's legal and ethical obligations. Llewellyn Graham has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. They are also responsible for investigating allegations of modern slavery in Nehemiah Housing's business or supply chains.

Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

Compliance

The prevention, detection, and reporting of modern slavery in any part of Nehemiah Housing's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for Nehemiah Housing.

Company or under Nehemiah Housing's control. You are required to avoid any activity that might lead to a breach of this policy.

If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your line manager or report it in accordance with Nehemiah Housing's Disclosures in the Public Interest Policy. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of Nehemiah Housing's business or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of Nehemiah Housing's supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager. You can also contact the Government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.

Nehemiah Housing aims 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. Nehemiah Housing is committed to ensuring no one suffers any detrimental treatment or victimisation because of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

Training and Communication

Regular training on this policy, and on the risk that the business faces from modern slavery in its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

Nehemiah Housing's zero tolerance approach to modern slavery will be communicated to all suppliers, contractors and other business partners when entering new or renewed contracts with them.

This policy will be displayed on Nehemiah's website following approval to demonstrate our commitment to Anti-Slavery and Human Trafficking Policy.

Breach of the Policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

Nehemiah Housing may terminate its commercial relationship with suppliers, contractors, and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

Monitor & Review

This policy will be reviewed on an **annual basis** or as deemed necessary due to changes in legislation or good practice.



Wilton Powell
Chairman



Llewellyn Graham
Chief Executive

Version History:

Version	Date	Author	Reason
Version 1	09/2022	Company Secretary	New Policy presented for adoption
Version 2	09/2023	Company Secretary	New Policy presented for adoption
Version 3	09/2024	Company Secretary	Policy presented for cyclical review