



Modern Slavery and Human Trafficking

Department:	Organisation
Version:	1
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Date approved: 26 th July 2023	To be reviewed: 26 th July 2026

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1. INTRODUCTION

- 1.1. Hill Homes is opposed to all forms of modern slavery and is committed to acting ethically and with integrity in all its business relationships.
- 1.2. Hill Homes is committed to ensuring there is no human trafficking involved in its supply chains or any part of its organisation.
- 1.3. Hill Homes has a robust suite of policies in place that contribute to the prevention of slavery and human trafficking:
 - Anti-Bribery and Anti-Corruption
 - Anti-Social Behaviour
 - Board and Employee Codes of Conduct
 - Data Protection and GDPR
 - Equality, Diversity and Inclusion
 - Hate Crime
 - Recruitment
 - Safeguarding Adults
 - Sustainability and Environmental
 - Whistleblowing

2. DEFINITIONS

- 2.1. Hill Homes refers to the group of companies comprised of Hill Homes Housing Association, Hill Homes Care Ltd and Hill Homes Care Services Ltd.
- 2.2. For the purposes of this policy, “tenant” refers to all tenants of Hill Homes Housing Association and clients of Hill Homes Care Ltd. and Hill Homes Care Services Ltd.
- 2.3. Modern slavery includes servitude, forced and compulsory labour.
- 2.4. For the purposes of this policy “supply chain” includes all manufacturers of parts and raw materials, contractors providing a service to Hill Homes and agencies providing temporary staff.

3. AIMS AND OBJECTIVES

- 3.1. This policy outlines the steps Hill Homes takes to ensure that adequate processes and controls are in place to ensure slavery and human trafficking are not taking place anywhere in its supply chains or in any part of its own business.

4. POLICY STATEMENT

- 4.1. Hill Homes is committed to Environmental, Social and Governance responsibility and has zero tolerance for slavery and human trafficking.
- 4.2. Hill Homes will take steps to prevent modern slavery and human trafficking from occurring in its supply chains or in any part of its business.

- 4.3. Hill Homes expects its suppliers not to use slave labour or engage in human trafficking and requires all new suppliers to confirm this by submitting a statement that they are not in breach of the Modern Slavery Act.
- 4.4. Hill Homes recognises that construction labour suppliers are particularly susceptible to modern slavery. Hill Homes will ensure its development contracts include a clause requiring compliance with the Modern Slavery Act.
- 4.5. Hill Homes will exclude any tender bid from a bidder that has been convicted of an offence under the Modern Slavery Act. It will seek to include provisions for termination in the event of a modern slavery or human trafficking breach by the supplier during the period of the contract.
- 4.6. Hill Homes has a safeguarding policy and procedures in place to guard against the risk that any tenant becomes a victim of slavery or human trafficking.
- 4.7. Hill Homes will ensure its recruitment processes fully comply with the Modern Slavery Act 2015. Hill Homes will ensure that checks on passports and other forms of identification are checked routinely.
- 4.8. Hill Homes will provide training to staff to ensure they understand the meaning of modern slavery and what action they should take in the event they suspect modern slavery or human trafficking is taking place.

5. LEGISLATION, REGULATION AND GUIDANCE

- 5.1. Hill Homes will meet all its legislative obligations and comply with regulations and guidance, including:
 - Modern Slavery Act 2015
 - General Data Protection Regulation, tailored by the Data Protection Act 2018
 - Equality Act 2010

6. CONFIDENTIALITY

- 6.1. All information will be handled in line with relevant GDPR legislation.
- 6.2. Personal information will not be shared beyond those with a need to know.

7. MONITORING AND REPORTING

- 7.1. Any staff member suspecting modern slavery or human trafficking in any part of Hill Homes' business or supply chain must report it to the Chief Executive.
- 7.2. The Chief Executive will review any reported cases of modern slavery or human trafficking and, should they appear to be substantiated, report them to the Police.

7.3. Should a reported instance of modern slavery or human trafficking involve a tenant, Hill Homes' Safeguarding Lead will implement the safeguarding procedures.

7.4. Any confirmed instances of modern slavery will be reported to the Board.