

IronOak



IRON OAK

**MODERN SLAVERY & HUMAN
TRAFFICKING STATEMENT**

Control Sheet

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Status	Published
Policy owner	Head of Operations
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Version	Date of review	Author	Note of revisions
01	February 2026	Head of Operations	- Reformatted and rebranded to IronOak - Section 1: Expansion of points 1.1, 1.2, 1.3 & 1.4 - Section 2: Expansion of points 2.1 & 2.3. Addition of 'Move-On Accommodation to point 2.2. Removal of reference to Property Management. - Section 3: Addition of point 3.2. - Section 4: Addition of whole section. - Section 5: Expansion of points 5.1 and 5.3. - Section 6: Removal of governance statement. Addition of point 6.1, Addition of risk based approach statement in point 6.3, Addition of point 6.4 & 6.5 - Removal of Employee section. - Section 7: Addition of whole section. - Section 8: Addition of whole section. - Section 9: Addition of whole section. - Section 10: Addition of whole section. - Section 11: Retitled from 'Review' to 'Approval', Removal of previous wording and replacement with point 11.1.

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1. Introduction

- 1.1. This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that IronOak Homes (IronOak) has taken, and continues to take, to prevent modern slavery and human trafficking within our operations and supply chains.
- 1.2. IronOak operates a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all business relationships. We are committed to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere within our organisation or supply chains.
- 1.3. This statement is approved by the Board of IronOak Homes and reflects our ongoing commitment to safeguarding vulnerable people and promoting ethical business practices.
- 1.4. All employees, contractors and partners are expected to report any concerns or reasonable suspicions that modern slavery or human trafficking may be taking place in any part of our organisation or supply chain.

2. About IronOak

- 2.1. IronOak is a registered provider of social housing specialising in supported housing. We are proud to provide vulnerable adults with safe, secure homes alongside innovative and responsive care and support services.
- 2.2. Our services help customers sustain their tenancies and live independent, fulfilling lives. Our provision includes:
 - Intensive housing management services
 - Housing with care
 - Move-on accommodation
- 2.3. As an organisation working with vulnerable individuals, we recognise our responsibility to maintain high standards of safeguarding, ethical conduct and social responsibility.

3. Our Values

- 3.1. Our organisational values guide our behaviour and decision-making:
 - Excellence
 - Safety
 - Sustainability
 - Integrity

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3.2. These values underpin our commitment to protecting individuals from harm, including exploitation associated with modern slavery and human trafficking.

4. Governance and Accountability

- 4.1. Responsibility for oversight of modern slavery risks sits with the Board of Directors, supported by senior management.
- 4.2. The Board reviews this statement annually and ensures that appropriate policies, procedures and controls are in place to manage modern slavery risks.
- 4.3. Managers across the organisation are responsible for ensuring staff understand their responsibilities and for escalating any concerns promptly through the appropriate safeguarding or whistleblowing channels.

5. Policies and Procedures

- 5.1. IronOak maintains a range of policies that support our commitment to preventing modern slavery and human trafficking and promoting ethical working practices.
- 5.2. These include:
- Safeguarding (Adults & Children) Policy
 - Whistleblowing Policy
 - Equality, Diversity and Inclusion Policy
 - Anti-Fraud and Corruption Policy
 - Bullying and Harassment Policy
 - Health and Safety Policy
 - Conflicts of Interest Policy
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- 5.3. These policies are reviewed regularly to ensure they remain effective, compliant with legislation and aligned with best practice.

6. Our Supply Chains

- 6.1. IronOak procures a range of goods and services necessary to support the delivery of housing and support services. These typically include:
- Property maintenance and repairs
 - Facilities and cleaning services
 - Office and operational supplies
 - Professional and support services
- 6.2. Many of our contracts are with public sector organisations and, in most circumstances, we source goods and services from UK-based suppliers.

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6.3. Although we assess the overall risk of modern slavery in our operations and supply chains to be relatively low, we recognise that risks can exist in any sector. We therefore take a risk-based approach to supplier oversight.

6.4. Our approach includes:

- Conducting appropriate due diligence on new suppliers
- Expecting suppliers to comply with relevant legislation, including the Modern Slavery Act
- Including ethical and safeguarding expectations within contractual arrangements where appropriate
- Monitoring supplier performance and raising concerns where risks are identified

6.5. Where concerns are identified, we will work with suppliers to address them or take appropriate action where necessary.

7. Recruitment and Employment Practices

7.1. IronOak is committed to ensuring that all employees are treated fairly, with dignity and respect, and that employment practices are transparent and compliant with employment legislation.

7.2. Our recruitment and employment practices include:

- Fair and transparent recruitment procedures
- Right-to-work checks for all employees
- Compliance with UK employment law and National Minimum Wage requirements
- Policies promoting equality, diversity and inclusion
- Clear grievance and whistleblowing processes

7.3. These measures help ensure that our workforce is protected from exploitation or coercion.

7.4. All employees also have access to a free and confidential 24-hour Employee Assistance Programme, offering independent support, advice and counselling in relation to work or personal matters.

8. Training and Awareness

8.1. IronOak recognises that awareness is key to preventing modern slavery.

8.2. We promote awareness among staff through:

- Communication of this statement and related policies

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- Safeguarding training and guidance
- Encouraging staff to report concerns through appropriate channels

8.3. Managers are responsible for ensuring staff understand the indicators of modern slavery and the processes for raising concerns.

9. Reporting Concerns

9.1. IronOak encourages all employees, contractors and stakeholders to report concerns about any issue or suspicion of modern slavery in any part of our organisation or supply chain.

9.2. Concerns can be raised through:

- Line management
- Safeguarding procedures
- The organisation's Whistleblowing Policy

9.3. All concerns are treated seriously and investigated appropriately.

10. Monitoring and Effectiveness

10.1. To measure the effectiveness of our approach to preventing modern slavery, IronOak will:

- Review relevant policies regularly
- Monitor safeguarding concerns and whistleblowing reports
- Assess supplier relationships and risks where appropriate
- Review this statement annually

10.2. This ensures that our approach remains proportionate, effective and aligned with evolving good practice.

11. Approval

11.1. This statement has been approved by the Board of Parasol Homes Limited and will be reviewed annually.

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