



Aenon Housing CIC

Homes with Purpose

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| Policy Name | Modern Slavery Policy |
| Version | 1.0 |
| Approved By | Board of Directors -Aenon Housing CIC |
| Effective Date | 01/02/2026 |
| Date of next Review | 01/02/2027 |

Aenon Housing CIC

Modern Slavery and Human Trafficking Policy

1. Purpose and Statement of Intent

1.1

Aenon Housing CIC is committed to preventing modern slavery, forced labour, servitude, and human trafficking within its organisation, housing services, supported accommodation, and all activities carried out on its behalf.

1.2

Modern slavery is a serious criminal offence and a grave violation of human dignity. Aenon operates a **zero-tolerance approach** and will take all reasonable steps to identify, prevent, and respond to risks of exploitation.

1.3

This Policy sets out Aenon's duties and expectations to ensure that people are treated lawfully, fairly, and with respect, and that any concerns are acted upon promptly and appropriately.

1.4

This document is designed to meet the requirements of the **Modern Slavery Act 2015** and to withstand scrutiny from regulators, commissioners, safeguarding authorities, auditors, and the courts.

2. Scope and Applicability

2.1

This Policy applies to:

- All employees (permanent, fixed-term, part-time, zero-hours);
 - Agency and temporary workers.
 - Volunteers and student placements.
 - Contractors and managing agents working on Aenon's behalf.
 - Board members and senior leaders.
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2.2

It applies to all Aenon-managed homes, workplaces, service locations, and housing-related activities.

3. Legal and Regulatory Framework

3.1

This Policy is aligned with:

- The **Modern Slavery Act 2015**.
- UK employment, immigration, and safeguarding legislation.
- Regulatory standards applicable to social and supported housing.
- Human rights and equality principles.

3.2

Modern slavery includes, but is not limited to:

- Slavery and servitude.
- Forced or compulsory labour.
- Human trafficking.
- Exploitation through coercion, deception, or abuse of vulnerability.
- Debt bondage or control through threats or intimidation.

3.3

This Policy operates alongside: Safeguarding Policy, Whistleblowing Policy, Recruitment Policy, Health & Safety Policy, Anti-Fraud and Corruption Policy, and Complaints Policy.

4. Organisational Commitment

4.1

Aenon Housing CIC will: a) Act lawfully and ethically in all employment and service-delivery practices;

b) Maintain systems to identify and respond to exploitation risks;

c) Ensure staff understand their responsibilities;

d) Take action where concerns are raised or risks are identified; and

e) Prioritise safety, welfare, and dignity.

4.2

Aenon recognises that individuals living in supported accommodation or experiencing

housing instability may face **increased vulnerability** to exploitation. Safeguarding considerations are therefore integral to this Policy.

5. Roles and Responsibilities

5.1 Board of Directors

- Has overall accountability for compliance with modern slavery legislation.
- Ensures appropriate governance and oversight.
- Receives assurance on policy effectiveness.

5.2 Senior Leadership

- Implements this Policy across Aenon's operations.
- Ensures risks are identified and managed.
- Oversees reporting and escalation arrangements.

5.3 Managers

- Remain alert to indicators of exploitation.
- Ensure staff follow reporting procedures.
- Escalate concerns without delay.

5.4 All Workers

- Must comply with this Policy.
- Must not engage in, facilitate, or ignore exploitation.
- Must report concerns in good faith.

6. Employment and Recruitment Practices

6.1

Aenon is committed to lawful and fair employment practices and will:

- a) Carry out right-to-work checks in line with legislation;
- b) Ensure workers are not required to pay fees to secure work;
- c) Provide clear terms and conditions of employment;
- d) Pay at least the National Minimum or Living Wage;
- e) Prohibit retention of passports or identity documents; and
- f) Respect freedom of movement and choice.

6.2

Any engagement of workers through third parties must meet equivalent standards.

7. Recognising the Signs of Modern Slavery

7.1

Indicators may include:

- Fear, distress, or signs of control by others.
- Lack of identification or personal documents.
- Unexplained movement restrictions.
- Inconsistent explanations or signs of coercion.
- Poor living or working conditions.

7.2

In housing and supported living settings, such indicators may overlap with safeguarding concerns and must be treated seriously.

8. Reporting Concerns

8.1

Anyone who suspects modern slavery must report it **immediately**.

8.2

Concerns may be raised through: a) A line manager;
b) Safeguarding Lead;
c) Whistleblowing Officer; or
d) Board-Level Responsible Officer.

8.3

Aenon's **Whistleblowing Policy** applies and provides protection for those who raise concerns in good faith.

9. Response and Action

9.1

All concerns will be assessed promptly and handled proportionately.

9.2

Where there is:

- Immediate risk of harm, emergency services will be contacted.
- Suspected criminal activity, matters will be referred to the police or **relevant authorities**.

9.3

Actions will prioritise safety, preserve evidence where required, and support affected individuals.

10. Victim Support and Safeguarding

10.1

Aenon recognises that victims may be fearful or reluctant to disclose exploitation.

10.2

Where modern slavery is suspected or confirmed, Aenon will: a) Prioritise immediate safety; b) Activate safeguarding procedures; c) Work with **relevant authorities** and specialist services; and d) Avoid actions that could place the person at further risk.

10.3

Individuals will not be penalised for unlawful acts they were compelled to commit.

11. Training and Awareness

11.1

Appropriate training will be provided to staff, managers, and Board members.

11.2

Training will cover:

- Understanding modern slavery.
 - Recognising indicators.
 - Reporting routes; and
 - Safeguarding responsibilities.
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12. Monitoring, Assurance and Governance

12.1

Aenon will monitor reported concerns and review trends and learning.

12.2

Governance arrangements ensure oversight, accountability, and policy compliance.

13. Breaches of This Policy

13.1

Any breach of this Policy may result in disciplinary action or termination of engagement.

13.2

Serious breaches may be reported to regulators or law-enforcement bodies.

14. Review and Update

14.1

This Policy will be reviewed **annually** or sooner if required by:

- a) Legislative change;
- b) Learning from incidents; or
- c) Board instruction.

14.2

All changes must be approved by the Board of Directors.
