



Zen Registered Providers: Modern Slavery Policy

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Policy Owner:	Board
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Approved by:	

1. Introduction

- 1.1. The purpose of this policy is to outline how Zen Housing Limited, Zen Housing 2 Limited and Zen Rented Limited (together Zen) will ensure transparency and prevent modern slavery in its operations.
- 1.2. Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking (the definitions of which comes from the Palermo Protocol).
- 1.3. The National Crime Agency defines Modern Slavery as:

“crimes include holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after. Although human trafficking often involves an international cross-border element, it is also possible to be a victim of modern slavery within your own country. It is possible to be a victim even if consent has been given to be moved. Children cannot give consent to being exploited therefore the element of coercion or deception does not need to be present to prove an offence.”

2. Purpose

- 2.1. Zen believe that all people in our communities have the right to feel safe and secure. Wherever they come into contact with Zen , they will be treated with both dignity and respect and all safeguarding concerns will be taken seriously and respond according to procedures and best practice. All workforce members have a duty to keep our residents, particularly children and young people, safe and to help protect them from abuse or harm.

3. Scope





- 3.1. This policy applies to all employees and officers of Zen Housing Limited, Zen Housing 2 Limited and Zen Rented Limited (together Zen) when performing housing management functions and other persons working for or on our behalf of the organisation in any capacity, including employees at all levels, agency, bank workers, students peer mentors, seconded workers, volunteers, contractors, suppliers and including all stakeholders/ partners commissioned by us.

- 1.1 Zen has contracts in place with Property Managers through which Zen ensures delivery of our housing management service and these Property Managers are instructed to comply and are required to accept the obligation to comply, with all aspects of this policy. Zen Board are responsible for monitoring the compliance of these Property Managers with this policy.

4. Policy Statement

- 4.1. Zen acknowledges that modern slavery is both a crime and a violation of human rights and will maintain a zero-tolerance stance against all forms of modern slavery, including slavery, servitude, forced and compulsory labour, sexual exploitation, and human trafficking.
- 4.2. Zen are fully committed to preventing modern slavery and human trafficking within our the organisation, the services and accommodation provided, and throughout supply chains. Zen will never knowingly engage with any organisation linked to modern slavery, human trafficking, or child labour.

5. Prevention of Modern Slavery

- 5.1. The Modern Slavery Act 2015 requires that Zen publishes a Modern Slavery and Human Trafficking Statement each financial year. This statement will outline the steps Zen have taken to prevent modern slavery in our operations and supply chains.
- 5.2. Although Zen have taken steps to ensure modern slavery and human trafficking does not take place in our supply chain, it is recognised that we cannot regulate the conduct of individuals or organisations in the supply chain. Therefore, Zen will undertake the following steps to ensure we have a robust procurement system:
 - Conduct risk assessments to identify which areas of our business and which of our suppliers are most at risk of modern slavery
 - Update the organisational risk register to reflect any changes
 - Ensure supplier adhere to ethical standards and do not engage in exploitative practices
 - Continue engagement with our supplier to monitor their actions to ensure modern slavery is not taking place in their business or supply chain





- 5.3. Zen will assess risks at every stage of procurement, engagement, and partnership development. We will take proactive steps to mitigate identified risks during the specification process and evaluate the potential for supplier non-performance through thorough due diligence and selection procedures.

6. Reporting Modern Slavery Concerns

- 6.1. Zen is committed to addressing all allegations of modern slavery with the utmost seriousness and will conduct thorough investigations through our robust whistleblowing process. Employees are encouraged to report any concerns about suspected modern slavery related to individuals within our organisation, our residents, or our suppliers. Reports should be made through their line manager or, if their line manager is implicated, through their line manager's peer.
- 6.2. If an immediate emergency response is required, colleagues can call the Police directly or contact Modern Slavery Helpline on 0800 0121 700 or Crimestoppers on 0800 555 111.

7. Key Safeguarding Principles

- 7.1. Underpinning Zen's approach to modern slavery and human trafficking is our safeguarding principles. The guiding principles to safeguarding are based upon the key principle that safeguarding is everyone's responsibility.
- 7.2. Zen adopts the four R's of safeguarding to remind everyone of these responsibilities:
- Recognise – Everyone must be familiar with the signs and symptoms of abuse.
 - Record – Any concerns or observations of abuse must be accurately recorded.
 - Report – Concerns or observations of abuse must be reported in accordance with the Zen's Safeguarding Procedures.
 - Refer – Where there is a concern of immediate risk to a vulnerable adult, do not delay and call the Police and/ or Children's Social Services.
- 7.3. Zen adopts the following principles of safeguarding in relation to modern slavery:
- The person's welfare is, and must always be, the paramount consideration.
 - All people have a right to be protected from abuse, neglect and harm regardless of their age, sex, gender reassignment, pregnancy and maternity status, sexual orientation, race, religion or belief, marriage and civil partnership status, or disability.
 - All people have the right to a safe environment.





- All colleagues and stakeholders / partners will ensure that all suspicions of abuse and allegations will be taken seriously and responded to swiftly and appropriately.

7.4. Zen's Safeguarding Children and Young People Policy and Safeguarding Adults Policy outlines our Safeguarding framework. As per these policies, Zen ensures that anyone working for us is trained to identify and prevent safeguarding issues, and understands the different aspects of safeguarding, including their duty to report. These policies should be read in conjunction with this policy.

8. Monitoring and review

- 8.1. This policy will be reviewed every three years unless legislation, business or sector developments require otherwise – to ensure that it continues to meet the stated objectives and take account of good practice developments.
- 8.2. We will review risks and assess the effectiveness of our controls at least once a year.

9. Background documents

9.1. This policy should be read in conjunction with the following legislative, regulatory and policy documents:

- Modern Slavery Act 2015
- Human Rights Act 1998

and the following strategies and policies:

- Safeguarding Adults Policy
- Safeguarding Children and Young People Policy
- Procurement Policy
- Risk Management Policy
- Whistleblowing Policy
- Anti-Bribery Policy

