Paragon Asra
PA Housing

## Paragon Asra Housing Limited

# Modern Slavery Policy

May 2026

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| **Owning manager** | Director of Governance and Company Secretary |
| **Department** | Governance |
| **Approved by** | People and Governance Committee |
| **Next review date** | May 2028 |

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Paragon Asra Housing Limited (PA Housing) is committed to equality and diversity. This policy has considered the Equality Act 2010 and its protected characteristics which are: race, gender, gender reassignment, disability, religion or belief, sexual orientation, age, marriage, civil marriage and partnership, and pregnancy and maternity explicitly.

We will make sure that all of our communication is fully accessible and to achieve this if a policy or document needs to be available in other formats we will provide them.

**AUDIT LOG**

| Date of Change | Who updated | Details of the change |
|---|---|---|
| May 2026 | Director of Governance and Company Secretary | Minor changes to make the policy more concise and clear. |
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## 1 Introduction

1.1 Modern slavery is a crime and a violation of a person's human rights and dignity. It is the severe exploitation of other people for personal or commercial gain and has a significant adverse impact on individuals, families, and communities across the world. Slavery within our supply chain conflicts with our belief of running a responsible business based on our values.

1.2 This Policy sets out our intention to identify and understand all risks of modern slavery to our business and to put in place steps to ensure that those at risk can be identified and there is no slavery or human trafficking in our business and our supply chains.

1.3 The Policy identifies where risks may arise and sets out how we will manage them.

## 2 What Is Modern Slavery

2.1 Modern slavery is defined as the recruitment, movement, harbouring or receiving of individuals using force, coercion, abuse of vulnerability, deception, or other means for the purpose of exploitation. It is a crime under the Modern Slavery Act 2015 and includes 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.

2.2 Modern slavery can take many forms including but not limited to:

- *Forced labour*
- *Bonded/debt labour*
- *Domestic servitude*
- *Sex trafficking*
- *Forced marriage*
- *Criminal exploitation*
- *Child labour*

2.3 The risks of PA Housing being exposed to instances of modern slavery are low since we only operate in the UK and many of our supply chains are UK based. Potentially, however, many of our residents or business partners in our supply chains can be victims of modern slavery or are vulnerable to it.

2.4 We recognise that any form of modern slavery within our business poses significant risks of reputational damage, legal repercussions, and financial risk to the organisation, so it is our aim to eliminate this wherever possible.

2.5 This policy seeks to ensure colleagues familiarise themselves with what modern slavery may look like and who may be at risk and promptly report any concerns they may have through the relevant channels or authority.

## 3 Policy Statement

3.1 PA Housing believes that everyone is unique and has a right to a life free from slavery. As such, we understand that we have a duty to protect the most vulnerable in our society. It is our responsibility to ensure that all possible avenues for abuse and exploitation and instances of modern slavery within our business and the communities in which we operate are closed off.

3.2 This Policy ensures compliance with the Modern Slavery Act 2015 as well as Article 4 of the European Convention on Human Rights. It meets our ethical and legal obligations as an employer, service provider, and business partner.

## 4 Scope

4.1 This Policy applies to all employees, including fixed term and temporary employees, volunteers, apprentices, agency, and reserve workers; contractors; external consultants; third party representatives; business partners and Board and Committee Members.

## 5 Principles

5.1 PA Housing has a responsibility to:

- Operate in an open and transparent manner
- Uphold high ethical standards and best practice
- Take a robust approach to slavery and human trafficking

5.2 We also know that everyone has a role to play in this and we have a zero-tolerance approach to modern slavery across all areas of our organisation as well as in our supply chains.

## 6 Key Points of Policy

6.1 Our key area of risk involves our relationships within our supply chains - suppliers, contractors, and business partners.

6.2 Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6.3 We will undertake appropriate due diligence when considering taking on new suppliers, contractors, and business partners, and regularly review our existing suppliers, contractors, and business partners.

6.4 Our procurement process requires all suppliers, contractors, and business partners to confirm in writing their level of compliance with the Modern Slavery Act 2015 and we will include relevant clauses in any contracts or agreements to ensure our business partners adhere to regulations.

6.5 Our procurement approach will require businesses who do not have obligations under the Modern Slavery Act 2015 or their own standalone policies to confirm in writing that they will agree and adhere to PA's Modern Slavery Policy.

6.6 Serious breaches of our supplier code of conduct may result in the termination of the business relationship

6.7 We will only contract with reputable agencies to recruit temporary staff and will ensure thorough due diligence is carried out when engaging with new agencies.

6.8 PA Housing will undertake right to work checks for prospective employees and will retain proof of these in accordance with our Document and Data Retention Policy.

6.9 Employees are encouraged to raise any concerns about any issue or suspicion of modern slavery in any area of our supply chain or organisation as early as possible.

6.10 If an employee believes or suspects a breach of this Policy has occurred or there is a risk of a breach occurring, they must notify their manager or report it in accordance with our Whistleblowing Policy as soon as possible.

6.11 We encourage openness and we will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

6.12 Any breaches of this policy by employees may be dealt with under our Disciplinary Policy and Procedure.

## 7 Training and awareness

7.1 As part of their induction training, all relevant staff and volunteers are required to read and understand this policy to ensure that they are able to identify anyone who may be at risk and act appropriately.

7.2 Where staff have specific roles with children and families, enhanced training will be considered.

7.3 Suppliers and partners will be required to read and agree to the terms of this policy.

## 8 Roles and Responsibilities

8.1 The PA Housing Board is accountable for ensuring the organisation adheres to good practice and the highest practicable ethical standards and that this policy complies with our legal obligations.

8.2 The Executive Management Team has overall responsibility for ensuring that this policy is implemented effectively and that processes and procedures are in place to ensure full compliance by all stakeholders.

8.3 Managers at all levels are responsible for ensuring that their staff understand and comply with this policy

8.4 It is the responsibility of the procuring manager or head of service to ensure that principles of this policy are implemented in contractual arrangements with our suppliers, contractors, and business partners and that compliance statements are obtained and retained.

## 9 Monitoring and review

9.1 This policy will be reviewed in line with our policy review schedules or as any change in legislation occurs**.**

9.2 We will publish an annual statement on our website which confirms our compliance with this Policy and our legal obligations under the Modern Slavery Act 2015. It will set out what actions we have taken during the financial year and what steps we intend to take for the upcoming year.

## 10 Linked Policies

10.1 This Policy should be read in conjunction with our:

- Procurement Policy
- Safeguarding policies
- Contractor code of conduct
- Employee code of conduct
- Probity policies
- Domestic abuse Policy

- Disciplinary Policy and Procedure