

## Human Rights and Modern Slavery Policy

<b>Policy Reference:</b>	A136
<b>Version Number:</b>	1
<b>Applies to:</b>	The Aurora Group and its services.
<b>Associated documents:</b>	Modern Slavery Statement Equality, Diversity and Inclusion Policy Anti Bullying Policy Dignity at Work Policy Whistleblowing Policy Procurement Policy
<b>Approved by:</b>	Executive Board
<b>Implementation date:</b>	April 2026
<b>Next review due by:</b>	April 2027
<i>This policy has been reviewed to ensure it promotes safeguarding and does not present barriers to participation or disadvantage any protected groups</i>	

# Aurora

## 0. Summary of changes since previous version of policy

- This is a new policy, incorporating aspects of Modern Slavery. Our Modern Slavery statement is available on our website.

## 1. Our Commitment

At Aurora, we believe everyone deserves to be treated with dignity, respect, and fairness. We are committed to upholding human rights in everything we do - from how we treat the children and vulnerable adults in our care, and our staff, to how we work with our partners and suppliers.

We have zero tolerance for any form of modern slavery, human trafficking, or forced labour, and we take proactive steps to ensure these practices have no place in our business or supply chain.

## 2. Legislation and statutory requirements

This policy is based on the following advice/legislation:

- Human Rights Act 1998
- The International Labour Organization (ILO) Conventions (Declaration on Fundamental Principles and Rights at Work)
- The UK Modern Slavery Act 2015
- UN Guiding Principles on Business and Human Rights

In practice, this means we are committed to:

- Providing a safe and healthy working environment.
- Ensuring employment is freely chosen, with no forced, bonded, or involuntary labour.
- Paying fair wages in line with local laws and market standards.
- Promoting equality, diversity, and inclusion.
- Preventing child labour in any form.
- Respecting freedom of association and the right to collective bargaining.

## 3. Scope

This policy applies to:

- All employees, contractors, and temporary workers at Aurora.
- Anyone working on our behalf, including suppliers, consultants, agency staff and business partners.

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## 4. Roles and responsibilities

### Human Resources (HR)

- Ensure all recruitment practices (including those for international care workers) are free from "recruitment fees" or bonded labour, as per the ILO "Employer Pays" Principle.
- Conduct annual audits of temporary staffing agencies to ensure they provide workers with written contracts and fair pay.
- Track and report on mandatory Modern Slavery training completion across the central team, colleges, schools and care homes.
- Monitor staff wellbeing and payroll to identify "red flags" of modern slavery (e.g., multiple employees sharing the same bank account or address).

### Procurement & Supply Chain

- Maintain a "High-Risk Supplier Register" (e.g., cleaning, catering, construction, and IT hardware) and require these vendors to sign the Supplier Code of Conduct.
- Prioritise suppliers that are B Corp Certified or have verified Living Wage accreditation wherever possible.
- Include specific termination clauses in contracts for any supplier found to be in breach of the Modern Slavery Act 2015.
- Conduct annual desk-based reviews of top-tier suppliers' human rights policies.

### Service leads

- Integrate Modern Slavery awareness into local Safeguarding training and updates, ensuring staff can spot signs of exploitation in students or residents.
- Ensure that any third-party contractors working on-site (e.g., maintenance) are properly vetted before entry.
- Foster an open environment where staff, students, and residents feel safe reporting concerns without fear of reprisal.
- Report any suspected incidents immediately to the Aurora Group Safeguarding Lead.

## 5. Definitions

**Human rights** are fundamental, inalienable rights and freedoms—such as life, liberty, equality, and freedom from torture—inherent to every person regardless of nationality, sex, or belief.

**Modern slavery** in the UK is defined by the [Modern Slavery Act 2015](#) as the exploitation of people, exercising control or ownership to deprive them of their freedom for personal or commercial gain. It encompasses slavery, servitude, forced/compulsory labour, and human trafficking, often involving threats, coercion, and violence

## 6. Our Supply Chain

We expect the same high standards from all our suppliers and partners.

We aim to work only with organisations that:

- Uphold the same human rights and labour standards as we do.
- Operate fair and transparent recruitment practices.
- Take steps to identify and eliminate risks of modern slavery within their own supply chains.

Where possible, we include clauses in supplier contracts that reflect our expectations on human rights and modern slavery.

## 7. Identifying and Managing Risk

Although our business operates within the UK education and care sector - where the risk of modern slavery is relatively low - we remain vigilant.

We do this by:

- Conducting due diligence on key suppliers and third-party contractors.
- Asking new suppliers to confirm compliance with the Modern Slavery Act.
- Conducting rigorous "right to work" and safeguarding checks (DBS) for all staff and agency workers.
- Training our team to understand and recognise potential signs of exploitation.

## 8. Reporting Concerns

We encourage anyone - employees, contractors, or suppliers - to report any concerns about potential human rights or modern slavery issues. Staff have access to an independent whistleblowing line, please see the whistleblowing policy for further details.

Reports from contractors or suppliers can be made confidentially to the Head of People or CEO, and will always be handled sensitively and investigated appropriately.

We will never tolerate retaliation against anyone who raises a concern in good faith.

## 9. Measuring Effectiveness

We measure our effectiveness through:

- Training completion rates (Target: 100% of staff).
- Supplier compliance (Target: 100% of high-risk suppliers audited annually).
- Incident reporting (Number of cases identified and remediated).

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## 10. Monitoring arrangements

Responsibility for this policy sits with the COO and the Head of People, who ensure it is communicated, understood, and followed across the business.

We know this is an ongoing responsibility.

The policy will be reviewed annually alongside our internal practices to make sure they remain effective, relevant, and aligned with our values as we grow.