

# Modern Slavery Policy Statement 2026 - 2027

**March 2026**

[wolverhamptonhomes.org.uk](http://wolverhamptonhomes.org.uk)



## Monitoring and review

Document owner	Approved by	Authorised by	Effective date	Review date
Head of People	Director of Corporate Services	Board Members	01 April 2026	Annually
Emma Rolinson	Julie Haydon	WH Board		

## Document History

Version	Summary of changes	Document Status	Date
V1.0	Reviewed to ensure fit for purpose and compliant with regulatory and statutory obligations.	Withdrawn	June 2024
V2.0	Updated Section 3.0 in relation to National Referral Mechanism following introduction of exploitation toolkits by Wolverhampton Safeguarding Together.	Withdrawn	March 2025
V3.0	Updated Section 4.0 to outline WH's monitoring processes for ensuring suppliers and subcontractors comply with the Modern Slavery Act 2015.	Live	March 2026

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## 1.0 Introduction

Wolverhampton Homes (WH) must ensure that all potential modern slavery risks related to its business are understood and that steps are in place that aim to ensure there is no slavery or human trafficking in its own business and, its partners and supply chains. WH is further committed to making sure that properties are not used to accommodate the work of human traffickers or to detain others against their will.

This statement is made under section 54 (1) of the Modern Slavery Act 2015 (MSA) and refers to the financial year ending 31 March 2025 and received approval from the Board as at 01 April 2026.

WH acknowledges its duty to notify the Secretary of State of suspected victims of slavery or human trafficking as introduced by section 52 of the Modern Slavery Act 2015.

WH considers that modern slavery encompasses sexual and criminal exploitation, human trafficking, forced labour and domestic servitude.

## 2.0 Structure and supply chain

WH is an Arm's Length Management Organisation (ALMO), responsible for managing over twenty thousand social housing properties on behalf of the City of Wolverhampton Council.

It is the company's aim to help make Wolverhampton an even better place to live by aiming to provide great homes in clean, safe neighbourhoods where our customers can access training, skills, and job opportunities.

Partners and supply chain consist mainly of services rather than goods, with the highest risk areas being associated with our repairs and maintenance activities. WH does not have any direct supply chain outside of the United Kingdom. All suppliers of our services are obtained through a procurement process (managed via a service level agreement with the City of Wolverhampton Council) that requires all contractors to comply fully with the Modern Slavery Act 2015.

There is an approved list of contractors and suppliers that WH work with and our purchase order payment system requires the use of pre-approved suppliers.

The labour supplied and recruited to WH in pursuance of its operation is carried out in the United Kingdom.

## 3.0 Due diligence processes

### Board / Chief Executive

Responsibility for compliance rests at the highest level with the WH Board, with responsibility delegated to the Chief Executive.

### Senior Team

The senior team are responsible for assessing risks associated with modern slavery and human trafficking within their areas of responsibility.

## **National Referral Mechanism and First Responder**

Wolverhampton Homes (WH) has a statutory duty to report any circumstances where there is reasonable cause to suspect that a child, young person, or adult (with or without care and support needs) is being exploited through modern slavery or human trafficking. WH fulfils this duty by making timely and appropriate referrals to a recognised First Responder Organisation.

For the purposes of WH, the designated First Responder Organisation is the City of Wolverhampton Council's Multi-Agency Safeguarding Hub (MASH), which acts as the single point of contact for the triage and assessment of all safeguarding concerns and requests for support relating to children, young people, and adults.

WH is represented on both Wolverhampton Safeguarding Together Board and associated forums, enabling oversight of safeguarding activity and referrals involving WH customers, tenants or their household members.

## **Adults**

Where there is reasonable cause to suspect an adult (with or without care and support needs) is being exploited or is at risk of exploitation, an e-marf will be completed - <https://marf.wolverhampton.gov.uk/>. The e-marf will be accompanied by an Exploitation Screening Tool for Adults:

<https://www.wolverhamptonsafeguarding.org.uk/images/2021/Adults%20Exploitation%20Screening%20Tool%20FINAL%202021%20JUNE%202021.docx>

For adults age 18-25, along with the submission of an e-marf, it may be more appropriate to complete the exploitation screening tool for children/young people: <https://www.wolverhamptonsafeguarding.org.uk/safeguarding-children-and-young-people/i-work-with-children-young-people-families/exploitation>

## **Child/Young Person**

Where there is reasonable cause to suspect a child is being exploited or is at risk of exploitation, an e-marf will be completed - <https://marf.wolverhampton.gov.uk/>. The e-marf will be accompanied by an Exploitation Screening Tool for Children:

[https://www.wolverhamptonsafeguarding.org.uk/images/2022/Wolverhampton\\_Exploitation\\_Screening\\_tool\\_0\\_to\\_25\\_years\\_Final\\_Version\\_with\\_restrictions.docx](https://www.wolverhamptonsafeguarding.org.uk/images/2022/Wolverhampton_Exploitation_Screening_tool_0_to_25_years_Final_Version_with_restrictions.docx)

If the adult, child or young person is at risk of significant harm and there is concern about immediate risk, the police should be contacted on 999.

## **Tenancy Management**

WH collects and processes personal data from customers and applicants primarily for the purpose of managing tenancies and delivering safe, effective housing services. As part of assessing housing applications, WH processes information in accordance with the City of Wolverhampton Council's Allocations Policy to determine eligibility and priority for housing.

To support our duty to prevent exploitation, abuse, and modern slavery, WH may share relevant personal data with the City of Wolverhampton Council's and other

authorised agencies where necessary and lawful. This includes sharing information for safeguarding adults and children, preventing and detecting fraud, identifying risk indicators of modern slavery or trafficking, and assisting in the investigation of criminal activity.

All applicants are required to provide specified identification documents, including photographic identification, to verify their identity and support their application. These checks help ensure that individuals are not placed at risk of exploitation and that fraudulent or coercive applications are identified.

WH is committed to transparency regarding how personal data is used. Our full Privacy Policy, which outlines the legal basis for processing and the rights of individuals, is available on the WH website:

<https://www.wolverhamptonhomes.org.uk/about-us/about-wolverhampton-homes/key-policies/privacy-policy/>

### **People Services**

The company's recruitment process ensures that all potential employees are checked to ensure they are eligible to work in the UK – in accordance with the Asylum and Immigration Act 1996 and Immigration Act 2016.

References are requested on all employees, and Disclosure and Barring Checks for applicants working with vulnerable people or children.

Salaries are in line with the Living Wage.

WH safeguarding and modern slavery awareness training is provided to ensure that all staff have an awareness and understanding of their role.

### **Employees and Line Managers**

All employees are encouraged to report any concerns about a person or property to their line manager. See First Responder section for Multi-Agency Safeguarding Hub contact details.

Wolverhampton Homes See It, Report It (SIRI) process supports the identification of, and response to concerns about a property or a person. All staff in the company are made aware of SIRI, supported by regular awareness campaigns, and encouraged to report any concerns.

### **Business Services**

WH maintain a risk management register ensuring the effective identification, monitoring and management of risk across Wolverhampton Homes with Modern Slavery as one of the identified risks. The risk register is reported through the governance framework to Board.

## 4.0 Supplier and Subcontractor monitoring processes

It is an expectation of WH when working with partners and suppliers that they observe our values on modern slavery and also carry out their own due diligence on their own supply chains, to limit the risk of modern slavery taking place.

The primary method of monitoring effectiveness within the supply chain is the pre-qualification criteria for suppliers during the tendering of new contracts and ongoing contract management, which includes a requirement that suppliers take appropriate steps to ensure that there is no slavery or human trafficking in its supply chains.

The City of Wolverhampton Council oversee the procurement of goods and services on behalf of WH, who are also a signatory to the Charter Against Modern Slavery. This goes further than existing law and guidance, committing councils to proactively vetting their own supply chain to ensure no instances of modern slavery are taking place.

## 5.0 Modern slavery policies

The company's policies and procedures are reviewed regularly to ensure they are fit for purpose, and compliant with regulatory and statutory obligations. Where required, new policies are agreed through the relevant governance structure and in consultation with Trade Unions and the Customer Involvement Panel.

There are a number of policies and procedures in place that contribute to the prevention of modern slavery occurring which include:

- Anti-Fraud and Bribery Policy.
- Dignity at Work Policy.
- Domestic Abuse Policy (for employees and customers).
- Employee Code of Conduct - a requirement for all staff to adhere to which includes requirements in relation to workplace behaviour and equality and diversity.
- Financial Regulations / Standing Orders.
- Health and Safety Policy.
- Recruitment and Selection Policy - which includes the requirement to undertake Disclosure and Barring Service (DBS), where applicable, and checks for eligibility to work in the UK.
- Safeguarding procedures.
- Statement on Equality and Diversity.
- Tenancy Management policies - which set out the action to be taken where our properties are used for unlawful purposes.
- Whistleblowing Policy and Procedure - which protects staff should they raise concerns about issues such as modern slavery.

Further information on Modern Slavery and associated guidance documents can be found on the following Safer Wolverhampton link:

<http://www.saferwolverhampton.org.uk/>

This statement will be reviewed annually in accordance with the Modern Slavery Act 2015 and published on the company website. It will also be included on the new government modern slavery statement registry.