

Modern Slavery Policy Statement 2025 - 2026

March 2025

Monitoring and review

Document owner	Approved by	Authorised by	Effective date	Review date
Head of People	Director of Corporate Services	Board Members	March 2025	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.	Live	June 2024
V2.0	Updated Section 3.0 in relation to National Referral Mechanism following introduction of exploitation toolkits by Wolverhampton Safeguarding Together.	Live	March 2025

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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 in March 2025.

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 Arms 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 we 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 Wolverhampton Homes 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

WH has a duty to report all circumstances where there is reasonable cause to suspect a child or young person, or adult (with or without care and support needs) is being exploited due to modern slavery or human trafficking.

This duty is discharged by making appropriate referrals to a First Responder Organisation. For the purposes of Wolverhampton Homes, the first responder organisation is the City of Wolverhampton Council's Multi Agency Safeguarding Hub (MASH). The MASH is the single point of contact for triaging and assessing all safeguarding and early intervention concerns/requests for support regarding children, young people and adults.

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

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.

Supply Chain

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.

Procurement

The tendering of new contracts and ongoing contract management includes an obligation for suppliers to comply with the Modern Slavery Act. The City of Wolverhampton Council (CWC) who are responsible for the procurement of goods and services for WH, is 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.

Tenancy Management

Wolverhampton Homes collate personal data for customers, primarily for the purpose of managing their tenancy. When assessing applicants, this is done in line with CWC's Allocations Policy and considers eligibility for housing and the priority awarded. Wolverhampton Homes will share this personal data with CWC for relevant purposes including safeguarding adults and children, preventing and detecting fraud or other criminal offences. The Privacy Notice is available on the WH website and is regularly reviewed and updated.

It is a requirement of all applicants to produce specified identification documents (including photographs) for verification in support of the application.

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 for all prospective employees, and Disclosure and Barring Checks for applicants working with vulnerable people or children. Salaries are paid 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 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 Monitoring

The primary method of monitoring effectiveness within the supply chain will be the pre-qualification criteria for suppliers and ongoing contract management, which includes a requirement to have measures in place to minimise the possibility of modern slavery in their business and supply chain.

WH is represented on the Adults and Children's Safeguarding Board to be able to monitor any referrals that concern WH tenants or their families.

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.

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.
- 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) and checks for eligibility to work in the UK.
- Safeguarding procedures.
- Statement on Equality and Diversity.
- Dignity at Work Policy.
- 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/>