

Modern Slavery Policy Statement

2022 - 2023

March 2023 – V4.0

Monitoring and review

Document owner	Approved by	Authorised by	Effective date	Review date
Head of People	Director of Corporate Services	Board Members	24 March 2023	Annually
Emma Rolinson	Julie Haydon	WH Board		

Document History

Version	Summary of changes	Document Status	Date
V2.0	Rebranded document, links to further information on Modern Slavery and associated guidance, defined roles and responsibilities, reference to the government modern slavery statement registry.	Live	June 2021
V3.0	Reviewed to ensure fit for purpose and compliant with regulatory and statutory obligations.	Live	March 2022
V4.0	Reviewed to ensure fit for purpose and compliant with regulatory and statutory obligations.	Live	March 2023

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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 2023 and received approval from the Board on 24 March 2023.

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 the majority of council homes in Wolverhampton.

WH wants to help make Wolverhampton an even better place to live where we aim to provide great homes in clean, safe neighbourhoods where our customers can access training, skills and job opportunities.

Our 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 do not have any supply chain outside of the United Kingdom. All suppliers of our services are obtained through a procurement process (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 UK.

3.0 Due diligence processes

Board / Chief Executive:

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

Senior Leadership Team:

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

First Responder:

WH have a statutory 'Duty to Notify' the Home Office when they come across potential victims of modern slavery. This duty is discharged by either referring a potential victim into the National Referral Mechanism (NRM) where they are a child, or consenting adult, or by notifying the Home Office where an adult does not consent to enter the NRM.

A First Responder Organisation is, in England and Wales, an authority that is authorised to refer a potential victim of modern slavery into the NRM.

For Wolverhampton Homes, the First Responder Organisation is Adult and / or Children's Social Care at the City of Wolverhampton Council (CWC) through a MARF (children) or SA1 (adults) referral.

Supply Chain:

We expect our partners and suppliers to share 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. 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:

All applications for properties at WH are checked and validated to ensure accuracy of the information supplied by an applicant.

People Services:

The 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.

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. Any suspected instances or concerns on modern slavery or trafficking will be reported to the First Responder through a Multi-Agency Referral Form (MARF) (children) or SA1 (adults) referral alongside the internal See it, Report it (SIRI) processes.

Business Services:

WH maintain a risk management register ensuring the effective identification, monitoring and management of risk across Wolverhampton Homes. Modern Slavery is one of the risks identified.

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 so can 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 WH's website. It will also be included on the new government modern slavery statement registry.

5.0 Modern slavery policies

Our policies and procedures are reviewed regularly to make sure that they are fit for purpose and compliant with regulatory and statutory obligations. Where required, new policies are agreed through the relevant governance structure and consultation with Trade Unions.

There are a number of policies and procedures in place that contribute to ensuring modern slavery does not occur in our business. These include the following:

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

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

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