

MODERN SLAVERY POLICY AND STATEMENT

Supported Exempt Accommodation Services

TABLE OF CONTENTS

Quality Standards.....	3
Key Principles.....	3
Policy Statement.....	4
Legislative Framework.....	4
Procedure.....	4
Training and Development.....	6
Monitoring and Review.....	6
Appendix A: Modern Slavery Statement.....	8
Appendix B: Supplier Modern Slavery Checklist.....	10
Authorisation and Signature.....	10

Quality Standards

Solace Housing has a zero tolerance approach to modern slavery and human trafficking in its own business, in its supply chains, and in the homes it manages. Many of our residents are vulnerable adults who may be at risk of, or may already have experienced, exploitation such as forced labour, sexual exploitation, criminal exploitation and cuckooing.

To achieve this, Solace Housing will ensure that:

Our Own Workforce Is Protected

Every worker is recruited lawfully, paid at least the National Living Wage, has their right to work checked, and keeps control of their own identity documents and wages.

Our Supply Chain Is Checked

Contractors, agencies and suppliers are assessed for modern slavery risk and must agree to our standards.

Residents Are Safeguarded

Staff recognise the signs of exploitation among residents and in our properties, and act on them through the Safeguarding Policy.

Concerns Are Reported

Staff, residents and contractors know how to report concerns, and every concern is recorded and acted on.

Our Approach Is Published

Solace Housing publishes an annual Modern Slavery Statement approved and signed by a Director.

Key Principles

Modern slavery includes slavery, servitude, forced or compulsory labour, and human trafficking. It happens when a person is controlled through threats, force, deception, debt or abuse of their vulnerability, and exploited for someone else's gain.

In supported housing, the most likely risks are the criminal exploitation of residents, including county lines drug dealing and cuckooing, where a resident's room is taken over by others; sexual exploitation; financial exploitation, including control of benefits; and labour exploitation in cleaning, maintenance and building work carried out by contractors.

Victims may not see themselves as victims, may be frightened of the authorities, and may not speak out. Staff must be curious, look beyond the obvious, and never ignore a concern.

Policy Statement

This policy applies to all Directors, employees, volunteers, agency workers, contractors and suppliers working for or on behalf of Solace Housing. The Director responsible for safeguarding is the lead for modern slavery.

Solace Housing's annual turnover is below the £36 million threshold set by section 54 of the Modern Slavery Act 2015, so publishing a statement is not a legal requirement. We publish a voluntary statement, set out in Appendix A, because we believe transparency is good practice and is expected by commissioners, Registered Providers and the Local Authority.

Any breach of this policy by an employee will be dealt with under the Disciplinary Policy (BVSC-022) and may be treated as gross misconduct. Any breach by a contractor or supplier may lead to termination of the contract.

Legislative Framework

This policy has been developed with reference to current legislation, statutory guidance and recognised good practice, including but not limited to:

- Modern Slavery Act 2015
- Home Office: Transparency in Supply Chains: A Practical Guide (statutory guidance)
- Modern Slavery: Statutory Guidance for England and Wales and the National Referral Mechanism
- Nationality and Borders Act 2022 (Part 5)
- Care Act 2014 (modern slavery as a category of abuse)
- Immigration, Asylum and Nationality Act 2006 (right to work)
- National Minimum Wage Act 1998 and Employment Rights Act 2025 (including the Fair Work Agency)
- Gangmasters (Licensing) Act 2004
- Supported Housing (Regulatory Oversight) Act 2023
- Birmingham Safeguarding Adults Board procedures
- Data Protection Act 2018 and UK General Data Protection Regulation

Procedure

1. Our Own Recruitment and Employment

- Right to work checks are completed for every worker before they start, under the Right to Work Checks Policy (BVSC-014).

- Workers are paid directly into their own bank account, at or above the National Living Wage.
- Solace Housing never holds workers' passports or identity documents, and never charges recruitment fees.
- Agency workers are only sourced from reputable agencies that confirm they meet these standards.
- Staff can raise concerns through the Whistleblowing and Grievance policies without fear of detriment.

2. Contractors and Suppliers

Before engaging a contractor for cleaning, maintenance, repairs, building or removals, Solace Housing will:

- Complete the Supplier Modern Slavery Checklist in Appendix B.
- Check that the contractor is a genuine business, with insurance and, where relevant, trade accreditation.
- Ask the contractor to confirm that their workers are paid lawfully, have the right to work, and are not subject to forced labour.
- Include a modern slavery clause in written agreements, allowing termination for breach.
- Be alert to warning signs on site, such as workers who appear frightened, are transported together, lack safety equipment, or are not allowed to speak for themselves.

3. Signs of Exploitation Among Residents

Staff must report any of the following to the Support Worker Manager or the Director the same day:

- A resident who appears controlled by someone else, does not have their own documents or bank card, or hands over their benefits.
- Unknown visitors staying in a resident's room, large numbers of visitors, or signs that a room is being used to sell drugs (cuckooing).
- A resident who is regularly collected and taken to work, or who works long hours for little or no pay.
- Signs of physical abuse, malnutrition, fear, or unexplained injuries.
- A resident who owes a debt they cannot repay to a person who controls them.
- Young people or vulnerable adults travelling to and from the property with no clear reason.

4. Responding to a Concern

1. If anyone is in immediate danger, call 999.
2. Listen to the person, reassure them, and do not promise to keep secrets. Do not confront a suspected exploiter.
3. Record what was seen and said, in the person's own words, on the case management system.
4. Report to the Director, who will make a safeguarding referral to the Local Authority and inform West Midlands Police where a crime is suspected.
5. Where the person is a potential victim, the Director will ask a first responder organisation, such as the Local Authority or the police, to consider a referral to the National Referral Mechanism. Adults must consent to an NRM referral.

6. Advice is available from the Modern Slavery and Exploitation Helpline on 08000 121 700.
7. Take action under the licence agreement where a resident's room is being taken over, working with the police to protect the resident.

5. Records and Confidentiality

All concerns and actions will be recorded on the Safeguarding Log. Information will be shared on a need to know basis with the police, the Local Authority and partner agencies, in line with the Data Protection Policy and information sharing agreements.

6. Annual Statement

Each year the Director will review this policy, the supplier checklist, training records and any concerns raised, and approve an updated Modern Slavery Statement (Appendix A). The statement will be published on the Solace Housing website and shared with Registered Providers and commissioners on request.

Training and Development

Solace Housing will make sure that all staff can recognise and respond to modern slavery. Training will include:

- What modern slavery and human trafficking are, and the signs to look for
- Criminal exploitation, county lines and cuckooing
- Financial and sexual exploitation of vulnerable adults
- How to report concerns and the National Referral Mechanism
- Supply chain risks in property maintenance and cleaning
- Safeguarding Adults and Safeguarding Children

Training will be completed at induction and refreshed every two years, and modern slavery will be discussed in team meetings when concerns arise.

Monitoring and Review

Compliance with this policy will be monitored through the quality assurance framework set out in the Quality Assurance Policy (SH002). Monitoring activities will include:

- Review of all modern slavery and exploitation concerns recorded on the Safeguarding Log and the action taken.
- Check that a Supplier Modern Slavery Checklist is in place for every regular contractor.
- Training records showing staff completion of modern slavery training.
- Annual review and sign off of the Modern Slavery Statement.

The Safeguarding Log, supplier checklists, training records and the published statement are the evidence locations for audit purposes. Findings will be reported to the Directors and any gaps will be addressed through a Quality Improvement Plan. This policy will be reviewed at least annually, or sooner where legislation, guidance or audit findings indicate that a review is necessary.

Appendix A: Modern Slavery Statement

Solace Housing Ltd: Voluntary Modern Slavery and Human Trafficking Statement 2026

This statement sets out the steps Solace Housing Ltd has taken to make sure that modern slavery and human trafficking are not taking place in our business, our supply chains or the homes we manage. It is published voluntarily, as our turnover is below the threshold in section 54 of the Modern Slavery Act 2015.

Our Organisation

Solace Housing Ltd is a supported exempt accommodation provider based at 96 Icknield Street, Birmingham, B18 6RU. We manage houses in multiple occupation on behalf of Registered Providers, providing housing and support to vulnerable adults.

Our Supply Chain

Our main suppliers are property maintenance and repair contractors, cleaning services, fire safety and compliance contractors, furniture suppliers, utilities, and staffing agencies. We consider maintenance, cleaning and building work to be the highest risk areas.

Our Policies

Our Modern Slavery Policy is supported by our Safeguarding, Right to Work Checks, Recruitment and Selection, Whistleblowing, Code of Conduct and Disciplinary policies.

Due Diligence and Risk

We check new contractors using our Supplier Modern Slavery Checklist, include modern slavery terms in agreements, carry out right to work checks on every worker, and pay all staff at least the National Living Wage. We recognise that our residents may be at risk of exploitation. All staff complete modern slavery training at induction and every two years.

Measuring Effectiveness

We monitor the number of concerns raised and referrals made, the percentage of regular contractors with a completed checklist, and the percentage of staff who have completed training.

This statement has been approved by the Directors of Solace Housing Ltd and will be reviewed annually.

Signed	
Name and Position	Rusal Khayyum, Director, Solace Housing Ltd
Date	29/10/2026

Appendix B: Supplier Modern Slavery Checklist

Supplier Name	
Service Provided	
Contact Name	
Date Checked	

Check	Yes / No	Notes
Registered business with address and contact details verified		
Public liability and employer's liability insurance seen		
Confirms all workers have the right to work in the UK		
Confirms workers are paid at least the National Living Wage into their own accounts		
Confirms workers keep their own identity documents		
Confirms no recruitment fees are charged to workers		
Agrees to modern slavery clause in contract		
Subcontracting only with Solace Housing approval		
No warning signs observed on site		

Risk Level	Low / Medium / High
Approved By	
Review Date	

Authorisation and Signature

This Policy is the authorised version agreed by the Directors of Solace Housing.

All employees are expected to follow this policy and failure to do so could result in disciplinary action.



Signed on behalf of Solace Housing.