



Modern Day Slavery Policy

Document Information

Issue Date	01/06/2025
Review Date	01/06/2026
Document Number	001084
Process Owner(s)	Chief Executive / AD Practice Development

This document will be uncontrolled when printed

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1.0 POLICY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

The Single Homeless Project (SHP) is a London wide charity with a mission to:

- **Prevent homelessness and poverty.**
- **Provide support and accommodation for people at risk of or experiencing homelessness**
- **Promote wellbeing and enhance opportunity.**

Our vision is a future where everyone has a place to call home and the opportunity to grow and thrive

SHP services are funded by the government, GLA and local authorities, trusts, foundations and institutions, cooperate partners and individual donors. UK government policy relating to housing, welfare, health and social care and local authority policy and funding are important aspects of the organisation’s operating environment, with legislation relating to housing, health and safety, safeguarding and data protection important in providing a framework for our operating practices.

The Modern Slavery Act 2015 requires all public bodies and their partners to adopt policies and practices which proactively tackle modern slavery and human trafficking. SHP is committed to ensure this is monitored throughout our organisation and supply chains, expecting that all our supply chain providers and their subcontractors apply such practices.

We expect all our staff to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure such practices are understood, reported and identified and tackled effectively.

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2.0 SHP STRUCTURE

SHP operates with a Psychologically Informed Environments framework and recognises that the people we work with come from a range of backgrounds and have diverse life experiences, strengths and protective factors that will shape how we work with them. Support provision centres around housing, health and wellbeing, finances, life skills, social equity, education, training and employment.

SHP currently has five core areas of service provision in London:

- **Multiple Disadvantage Adult Accommodation Services**
- **Rough Sleeping and Tenancy Sustainment Team (North) Services**
- **Floating Support Services**
- **Children and Young People's Services**
- **Single Homeless Prevention Services and Pan London Offender Services**

In 2024/25 we supported over 10,000 people in 160 services across London. SHP is a managing agent and support provider for 959 supported accommodation bedspaces. We have approximately 850 permanent and locum staff working for us. The charity has a turnover of £44m. We spend more than £17.5m on third-party suppliers.

3.0 SHP SUPPLY CHAINS

SHP does not operate an extensive, worldwide supply chain. Due to this we are able to build close relationships with suppliers which enable us to promote our commitment with regards to social value and responsibility, living wage, sustainable procurement, a focus on supporting the local economy when possible and to work with our supply chain providers to zone out and, when possible, fully eliminate slavery and human trafficking. Our largest areas of spend on suppliers are utilities, property repair and maintenance services, agency staff working in our services, and IT services.

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4.0 ROLES & RESPONSIBILITIES

SHP Chief Executive will:

- Ensure the SHP Modern Slavery Policy and its effectiveness is reviewed annually and the updated version published on the SHP website.

SHP Senior Management Team will:

- Ensure that the SHP Modern Slavery Policy and related management policies and procedures are understood and adhered to by staff within the teams and areas of responsibility.
- Oversee the response to any modern slavery complaints or safeguarding concerns should they arise.

SHP Finance and Maintenance Team will:

- Ensure all Procurement and Contractor Management Policies and Procedures are regularly reviewed.
- Ensure that routine and regular checks and audits are carried out on contractors, contracts and suppliers to ensure compliance with this policy.

All SHP Managers will:

- Adhere to the SHP Procurement and Contractor Management Policies and Procedures and flag any concerns immediately should be identified.
- Ensure that any Modern Slavery Safeguarding Concerns regarding clients are responded to in line with the SHP Safeguarding policy and Procedure.

All SHP Staff will:

- Ensure they understand signs and indicators of Modern Slavery and understand how to respond if a potential risk is identified or they become aware of modern slavery or human trafficking abuse is taking place.
- Ensure they complete the mandatory SHP safeguarding training and refresher training.

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5.0 SHP MANAGEMENT RESPONSE

Prevention of Modern-Day Slavery and Human Trafficking

5.1: SHP Staff

We have clear recruitment procedures and processes including Right to Work checks for all permanent and interim staff. We pay at least the London Living Wage in all our services, and we ensure that any recruitment partners we use for temporary staff pay the London Living Wage in our services.

All SHP managers and staff must adhere to the **SHP Code of Conduct** which clearly sets out expected standards of behaviour. The Code of Conduct requires staff to act with honesty and integrity, to report misconduct, and to take responsibility for safeguarding as appropriate for their role.

All SHP staff receive regular supervisions and annual appraisals to ensure they are competent and confident in their role.

5.2: Safeguarding

As part of our work, we identify and support people who have experienced modern slavery and human trafficking. SHP staff are inducted into our safeguarding policies and procedures and required to complete mandatory safeguarding e-learning on an annual basis which includes content on modern day slavery. In addition, client-facing staff attend face-to-face safeguarding training.

All clients we support in our accommodation and community services have a Support & Safety Plan which is reviewed with them a minimum of every 3 months to assess any potential or actual risks to themselves or others. All Support & Safety Plans are reviewed and approved by managers.

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Safeguarding Concerns are captured on our Safeguarding Records on SHP Inform. Concerns are also raised with London borough safeguarding teams, the police and specialist agencies as appropriate. SHP is signed up to the London Multi-Agency Safeguarding Adults Policy Framework and the MPS Philomena Protocol to enable effective safeguarding partnership working.

SHP operates with a quarterly Safeguarding Panel attended by the CEO and Director of Services. The panel reviews safeguarding data, serious cases, London borough partnership working and best practice responses to specific types of abuse, including modern day slavery and human trafficking.

The organisation has Designated Adult and Children Safeguarding Leads.

SHP Safeguarding Policy and Procedure are reviewed annually.

5.3: Procurement

SHP has a **Procurement Policy** and **Contractor Procurement and Management Policy and Procedure**, with regularly reviewed procurement thresholds and procedures in place.

We seek to apply fair, transparent and responsible practices in each stage of procurement, and endeavour to ensure that suppliers are subject to relevant checks and that our main contractors receive annual review meetings.

5.4: Tenancy and Licence Management

We have comprehensive referral processes into all our accommodation services, including checking proof of identity.

We carry out regular checks on all clients living in our properties as part of the provision of support. This greatly minimises the risk of any of our clients living in our accommodation being subject to modern slavery or human trafficking.

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5.5: Whistleblowing

SHP has a **Whistleblowing Policy & Procedure** through which staff can raise concerns in confidence with a nominated person up to CEO level and/or the Chair of Trustees. These concerns are investigated, and a summary of all cases are reported to our Board of Trustees.

6.0 COMMUNICATION

We share this policy with our staff, volunteers and partners and raise awareness of the Modern Slavery Act 2015 and what action to take if there are any concerns. This policy is placed prominently on our Intranet and our website www.shp.org.uk.

7.0 MONITORING & REPORTING

This policy is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Single Homeless Project's (SHP) slavery and human trafficking statement for the financial year **2025/26**.

SHP monitors and reports on all Modern Slavery Safeguarding Concerns raised by staff and Safeguarding Enquiries raised with London Borough Local Authorities.

8.0 ASSOCIATED DOCUMENTS

- SHP Safeguarding Policy and Procedure
- Home Office Modern Slavery Awareness and Victim Identification Guidance
- SHP Recruitment Policy & Procedure
- SHP DBS Policy & Procedure
- SHP Code of Conduct
- SHP Procurement Policy
- SHP Contractor Procurement / Management Policy and Procedure.

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