

Modern Slavery and Human Trafficking Statement

For the financial year ending 30 April 2025

Harley House Supported Living Ltd, Company No: 13136105

1. Introduction

Harley House Supported Living Ltd ("HHSLL") is committed to preventing slavery and human trafficking in its business operations and supply chains. This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 ("the Act") and sets out the steps HHSLL has taken during the financial year ending 30 April 2025 to ensure that modern slavery or human trafficking is not taking place in either our business or our supply chains.

2. Our Organisation and Supply Chains

Harley house supported Living is a specialist supported living provider based in Great Bentley, Essex, providing support services to adults with learning disabilities, autism and complex behavioural and physical health needs. We currently support fourteen individuals across seven properties and employ approximately 100 staff. We operate across multiple local authority and NHS-commissioned contracts.

Our supply chain includes: recruitment agencies, property maintenance and adaptation services, specialist consultancy, and specialist equipment and furniture providers. We expect all suppliers and contractors to adhere to our values and to the requirements of the Act.

3. Our Policies on Slavery and Human Trafficking

We have the following policies in place:

- A zero tolerance policy for forced, bonded or trafficked labour.
- A recruitment and agency worker policy including right to work, references, DBS checks, verification of identity and legitimate pay arrangements.
- A whistleblowing and Freedom to Speak Up policy enabling staff and contractors to report concerns without fear of retaliation.
- A supplier code of conduct which requires all suppliers to comply with applicable employment and human rights laws including the Modern Slavery Act.

4. Due Diligence and Risk Management

Our actions to assess and mitigate risk include:

- Pre-employment checks for all employees and agency workers.
- Regular audit of key suppliers, including questionnaires reflecting Modern Slavery risks and supplier evidence of compliance with relevant policies.
- Contract clauses requiring suppliers to warrant that goods or services provided comply with the Act and to notify HHSLL of any material breaches.
- Training for key staff (including recruitment, procurement and senior managers) on recognising indicators of modern slavery and human trafficking.

- Monitoring of complaint, whistleblowing and safeguarding data to identify any indicators of modern slavery or human trafficking in our business or supply chain.

5. Training and Raising Awareness

All staff undergo induction training that includes awareness of modern slavery and human trafficking, safeguarding responsibilities and whistleblowing procedures. Supervisors and managers receive refresher training annually. We also communicate our expectations to suppliers and encourage them to embed the same vigilance in their workforce.

6. Effectiveness and Key Performance Indicators

We monitor progress through the following indicators:

- Number of new supplier audits incorporating modern slavery criteria.
- Percentage of required suppliers who sign our supplier code of conduct annually.
- Number of staff who complete modern slavery training each year.
- Number of whistleblowing or safeguarding incidents referencing potential forced labour, exploitation or trafficking (target: zero).
- Reviews of procurement contracts in high-risk categories (e.g., recruitment agencies, maintenance services, furniture supply).

7. Looking Forward

In the coming year we will:

- Review and update our supplier risk-assessment tool to reflect emerging risks in the recruitment and property maintenance sectors.
- Extend our audits to include second-tier suppliers.
- Develop further training materials specifically for staff working in high-risk supply chain areas.
- Publish our statement on our website and ensure it is accessible to all stakeholders.

8. Approval

This statement has been approved by the Board of Harley House Supported Living Ltd and is signed on its behalf:

Signed: 
 Name: Benjamin Patel
 Position: Director
 Date: 27/10/2025