

WALES & WEST HOUSING

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

YEAR ENDED 31 DECEMBER 2017



Wales & West Housing is committed to providing a full statement as required under the transparency provisions of the Modern Slavery Act 2015.

Wales & West Housing (WWH) is a not-for-profit housing provider to more than 20,000 people which has over 400 employees. As a registered Co-operative and Community Benefit Society we own and manage over 11,500 high quality affordable homes in 15 local authority areas across Wales. These include more than 3,000 dedicated properties for older people and innovative supported housing solutions for people with a range of particular needs. Our vision is to achieve strong, sustainable growth to make a difference to people's lives, homes and communities. Turnover for 2017 was £60m.

WWH operates solely in Wales and, when possible, procures from Wales. It is important to us that we consider local and ethical manufacture by the way we "buy right". Our principal development contractors and property services contractors and suppliers' commitment to our Social Value and Community Benefits Charter supports our ongoing Making a Difference framework.

As an employer we are committed to paying the Joseph Rowntree Foundation Living Wage. We regularly review all our terms of employment to ensure that they comply with all relevant legislation. Principal contractors demonstrate their progress towards being a living wage employer by signing our Fair Payment Charter. WWH has sourced e-learning training and will provide training to relevant staff to ensure that they understand the potential risks of Modern Slavery in delivering our services and managing our supply chain. Government guidelines to identify and to support victims were highlighted in the Chief Executive's briefing and are available and accessible to all employees via the intranet. WWH is also currently considering the implications of signing up to the Welsh Government's Code of Practice: Ethical employment in supply chains.

Our anti-slavery and human trafficking statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing systems and controls that seek to ensure slavery and human trafficking is not taking place anywhere in our supply chains. WWH will not support or deal with any business knowingly involved in slavery or human trafficking in any part of its operations. We will only trade with those who fully comply with this statement or those who demonstrate steps towards compliance.

To identify and mitigate risk the review of our supplier qualification process remains ongoing to ensure that all our contractors and suppliers are careful, caring, competent and

capable. Contractors and suppliers will be required to complete a self-assessment pre-qualification questionnaire, which includes questions targeted at slavery and human trafficking risk and child labour protection. Not only will this raise their awareness of the requirements of the Act it will also emphasise the importance WWH places on being able to evidence compliance.

The Board, Executive Directors and Senior Management have not been made aware of any issues of modern slavery within the Group's businesses or supply chains and believe that the following policies, each of which is designed to support legal compliance and best practice, should be sufficient to prevent or enable early identification of matters which may be of concern:

- Recruitment and Selection Policy and Procedures
- Employee Code of Conduct
- Whistleblowing Policy
- Anti-fraud Policy and Procedure
- Financial Regulations
- Safeguarding of Vulnerable Adults & Children

This statement is made under Section 54(1) of the Modern Slavery Act 2015. It constitutes the Group's slavery and human trafficking statement for the financial year ending 31st December 2017. The turnover of the Group exceeds £36m for that period. This statement has been approved by the Board of Wales & West Housing who will review and update it annually.

Signed



Sharon Lee
Chair
Wales & West Housing

Signed



Anne Hinchey
Chief Executive
Wales & West Housing

Date: 17 May 2018