

WALES & WEST HOUSING

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement has been published in accordance with the Modern Slavery Act 2015 s54 and sets out the steps taken by Wales & West Housing (WWH) to prevent modern slavery and human trafficking in our business and supply chains for the financial year ending December 2019.

Introduction

Modern slavery and human trafficking is an issue that exists in both developed and developing economies and across business sectors. WWH has a zero-tolerance approach to slavery, servitude, forced labour and human trafficking (modern slavery). We are committed to working with our partners and suppliers to raise awareness and understanding of modern slavery and eliminating the practice from the supply chain.

Structure and supply chains

WWH is a not-for-profit housing provider to more than 20,000 people and has over 400 employees. As a registered Co-operative and Community Benefit Society we own and manage over 12,000 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 2019 was £63m.

WWH operates solely in Wales and, when possible, procures from within 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 provides role-based e-learning training to ensure that relevant staff understand the potential risks of Modern Slavery in delivering our services and managing our supply chain. Government guidelines to identify and support victims are available and accessible to all employees via the intranet.

In 2019 WWH signed up to the Welsh Government's Code of Practice: Ethical employment in supply chains (COP). In signing up to the COP it has provided access to the Welsh Government e-learning module which supports and educates relevant staff to recognise and deal with Modern Slavery and Human Rights issues. In compliance with the COP a whistleblowing mechanism to report concerns from external parties has been incorporated into the WWH website.

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 does not and 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.

Risk Assessment and due diligence

To identify and mitigate risk the review of our supplier qualification process has taken place. As part of the process, contractors and suppliers will be required to complete a self-assessment pre-qualification questionnaire. There is also guidance and supporting documentation to assist the internal process. Questions targeted at slavery and human trafficking risk, child labour protection and ethical employment practices are considered as part of our procurement process. Not only will this raise their awareness of the requirements of the Act and COP it will also emphasise the importance WWH places on being able to evidence compliance.


Policies on modern slavery

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
- Ethical Employment Policy

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 2019. 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



Alex Ashton
Chair
Wales & West Housing

Signed



Anne Hinchey
Group Chief Executive
Wales & West Housing

Date: 16 April 2020