

## **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 2023.

#### **Introduction**

Modern slavery and human trafficking are issues that exist 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 450 employees. As a registered Co-operative and Community Benefit Society, we own and manage over 12,400 high quality affordable homes in 14 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 2023 was over £73m.

WWH operates solely in Wales and, when possible, procures from within Wales. It is important to us that we consider local and ethical manufacturers by the way we "buy right". Our principal development contractors and property services contractors and suppliers work with us to deliver social value and community benefits to support 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 are asked to demonstrate their progress towards being a living wage employer during procurement and at contract reviews.

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. WWH has also developed an in-house e-learning Code of Practice tool to make sure all staff have access to the relevant information. 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, WWH continues to evaluate and review our supplier qualification. The aim of this process is to work with contractors and suppliers to ascertain relevant information regarding the ethical running of their businesses. There is also work ongoing to ensure WWH staff have 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**

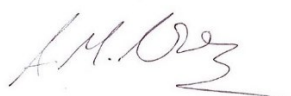
The Board, Executive Directors and senior management have not been made aware of any issues of modern slavery within the Association's businesses or supply chains and believe that the following policies, each of which is designed to support legal compliance and best practice, should be sufficient to 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 Association's slavery and human trafficking statement for the financial year ending 31 December 2023. The turnover of the Association 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

Signed



Alex Ashton  
Chair  
Wales & West Housing

Anne Hinchey  
Group Chief Executive  
Wales & West Housing

Date: 16 April 2024