

## **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 2024.

#### **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 12,500 high quality affordable homes in 13 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 2024 was over £83m.

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 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 addition, specific procurement training has been introduced incorporating assessment and due diligence procedures in relation to ethical requirements.

In 2019 WWH signed up to the Welsh Government's Code of Practice: Ethical employment in supply chains (COP). WWH has 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. WWH have the right to terminate the contract with immediate effect if the contractor or their supply chain are found guilty of modern slavery acts.

### **Risk Assessment and due diligence**

To identify and mitigate risk WWH continues to adopt the supplier qualification process to define legislative and ethical requirements, enabling the evaluation and assessment against COP commitments. WWH staff have guidance and supporting documentation to assist the with 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. The supplier qualification process encourages suppliers to sign up to the COP not only does this raise their awareness of the requirements of the Act and COP it also emphasises the importance WWH places on being able to evidence compliance.

The implementation of the procurement framework ensures that systems and processes are in place to assess and provide reassurance that WWH, suppliers/contractors, sub-contractors and supply chains are legally compliant. In addition, the process sets an expectation for suppliers to implement due diligence procedures for its own supply chain and subcontractors in alignment of the Code of Practice and to ensure that WWH work with suppliers whose values are aligned.

### **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:-

- Employee Code of Conduct
- Whistleblowing Policy
- Anti-fraud Policy and Procedure
- Financial Regulations
- Safeguarding of 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 2024. 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



Alex Ashton  
Chair  
Wales & West Housing

Signed



Anne Hinchey  
Group Chief Executive  
Wales & West Housing

Date: 17/04/25