



## WALES & WEST HOUSING GROUP POLICY

### Ethical Employment Policy

DOCUMENT CONTROL DETAILS	
<b>Policy Owner</b>	<i>Executive Director – Corporate Strategy &amp; Services</i>
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#### 1. Introduction

This policy describes the Wales & West Housing (WWH) approach to Ethical Employment. The policy applies to WWH and to WWH subsidiaries insofar as they are part of the WWH supply chain.

In 2017 Welsh Government launched a Code of Practice for Ethical Employment in Supply Chains. Organisations in receipt of Welsh public funds, including housing associations that receive social housing grant, are expected to sign up to the Code. The purpose of the Code is to support the development of more ethical supply chains to deliver contracts and is designed to ensure that workers in these supply chains are employed fairly and ethically and in compliance with UK, EU and International legislation. Organisations are expected to produce a written policy on ethical employment within their own organisation and how this will apply to their supply chains.

The Code has been reviewed and updated in 2025 with greater emphasis Welsh Procurement Policy Notes (WPPNs), risk assessment and expenditure review, annual transparency statements, Living Wage, and training and accountability.

#### 2. WWH values

Our values are important to us and central to everything we do as an organisation. They reflect our culture, the way we work with residents, suppliers and how we treat our staff in addition to behaviours required of our staff, and our key guiding principles in achieving our

aims of “strong sustainable growth to make a difference to people's lives, homes and communities”.

- **Fair** – Balanced, giving both praise and constructive criticism. Inclusive respecting the dignity and individuality of everyone
- **Open** - Willing to change and committed to improvement and learning. Transparent, honest and trustworthy
- **Responsible** - Professional, challenging existing arrangements, taking ownership of issues and seeing things through
- **Supportive** - Easy to deal with, approachable and accessible. Welcoming, caring, listening and responsive
- **Efficient** - Make the best use of resources to maximize the impact of our activities

### 3. WWH approach to Ethical Employment

WWH fully supports the elimination of unethical practices outlined in the Code of Practice, including:

- Modern Slavery and human rights abuses
- Blacklisting
- False self-employment
- Unfair use of umbrella schemes and zero hours contracts

In line with the Code of Practice, WWH supports:

- The payment of the **Living Wage** set by the Living Wage Foundation. This is a voluntary hourly rate that is based on the cost of living.

In addition to WWH complying with the Code of Practice in terms of its own employment practices, a range of good practices are used to ensure a fair and ethical approach to both recruitment and employment including:-

- Role profiles to describe the functions of each role
- Appropriate advertising of roles to ensure fair access
- A recruitment procedure including pre-employment checks with trained recruiters
- The use of recruitment agencies in limited circumstances only
- Written terms and conditions
- Pay scales and rates which are assessed independently or by using a job evaluation scheme
- A range of policies and procedures covering all aspects of employment which are available to all staff members for example a Whistleblowing policy and Equality and Diversity policy
- Health and Safety Policies and Procedures to protect WWH staff in the workplace
- Support through an employee assistance and counselling service, and a health cash plan benefit

#### 4. Who does this policy apply to?

This policy applies to the following areas:

- The overall approach WWH takes in its daily business,
- The recruitment, employment and training of staff by WWH.

#### 5. What does this mean for the WWH supply chain?

Wherever reasonably practicable WWH will only trade with those who comply with the Code of Practice or those who demonstrate steps towards compliance. WWH will encourage suppliers to promote our commitment to the Code of Practice further down the supply chain which includes sub-contractors.

#### 6. Implementation of the Ethical Employment Policy

- We will publicise the Ethical Employment Policy both internally and externally. We will carry out training to support the policy as appropriate.
- We have reviewed our Whistleblowing Policy so that it also provides a mechanism for people outside WWH to raise suspicions of unlawful and unethical employment practices. The policy is published both internally and externally and reviewed annually.
- In line with requirements of Section 54 of the Modern Slavery Act 2015, we will produce and publish an annual Modern Slavery statement outlining measures undertaken during the year.
- We will promote our Ethical Employment Policy as part of our procurement process and ensure that employment practices are considered.
- We will work with suppliers in line with our values and will continue to promote the WWH Prompt Payment Code.
- We will continue to be a Living Wage Foundation Living Wage employer and promote and encourage all contractors to adopt the same approach.
- We will continue, where possible, to procure both locally and ethically.
- We will endeavour to create opportunities to keep the Welsh pound within Wales
- We will review our expenditure and undertake a risk assessment to identify products and services where there is a risk of modern slavery or illegal or unethical employment practices within the UK and overseas.
- We will publish an annual, Board-approved statement outlining actions taken to prevent modern slavery and unethical employment in the organisation and its supply chains, and make it publicly accessible—aligning with the Modern Slavery Act where applicable.
- We will ensure all staff involved in procurement, recruitment, or worker deployment receive and complete training on modern slavery and ethical employment practices, with records kept and resources provided to support compliance.

#### 7. Review

This policy will be reviewed annually