

## **WALES & WEST HOUSING**

### **ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT**

#### **YEAR ENDED 31 DECEMBER 2018**

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 2018 was £65m.

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 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 to support victims are available and accessible to all employees via the intranet.

WWH recently signed up to the Welsh Government's Code of Practice (COP): Ethical Employment in Supply Chains and has approved an Ethical Employment policy. We will use the Welsh Government e-learning module on the COP to support and educate 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 wish to 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, WWH has commissioned and outsourced the project to develop a Suppliers Qualification system. As part of the process, contractors and suppliers will be required to complete a self-assessment pre-qualification questionnaire, which is currently being devised, together with internal 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 the procurement process. Not only will this raise their awareness of the requirements of the Act and the COP, 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
- 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 2018. 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

Group Chief Executive

Wales & West Housing

Date: 13/06/2019