

MODERN SLAVERY ACT STATEMENT ANTI-SLAVERY AND HUMAN TRAFFICKING 2018/19

1. Introduction

whg is opposed to all forms of modern slavery and is committed to acting ethically and with integrity in all its business relationships. We take steps to ensure that adequate processes and controls are in place to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015. It outlines the steps whg has taken during the 2018/19 financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business.

2. Structure and Supply Chains

whg owns and manages 22,000 homes across the West Midlands. We employ around 735 colleagues, who support the provision of affordable, good quality homes and services to more than 50,000 customers.

Our supply chains cover goods, services and works necessary to:

- Deliver front line services to residents in the properties we manage.
- Build new homes.
- Support the “back-office” services that keep the business operating efficiently.

This Statement is approved by Walsall Housing Group’s Board and applies to all organisations within the Group:

Visionary Investment Enhancing Walsall
Anthem Homes Limited
whg Trading Company Limited
Buy for Good CIC
whg Treasury PLC
whg Developments Limited
Cricket Close LLP

The Statement is reviewed and updated annually.

3. Policy Framework

We have an extensive and robust framework of policies, procedures and contractual requirements in place which contribute to the prevention of slavery and human trafficking. Key policies include:

Procurement Policy

Our Procurement Selection Questionnaire includes questions related to modern slavery and human trafficking to identify and mitigate risk in supply chains.

Specifically, all new procurement contracts contain the following clauses:

- “The Service Provider shall, and shall use reasonable endeavours to ensure that its employees or agents and/or supply chain shall, at all times act in a way which is compatible with the Modern Slavery Act 2015.
- Where relevant the Service Provider must publish a statement as required by the Act.
- The Client reserves the right, upon reasonable notice, to audit this at any time during the contract period. In the event that the Client considers that a Service Provider is not in compliance with the Modern Slavery Act 2015 the Service Provider must take all such appropriate remedial actions as requested by the Client to address any areas of concern.
- The Service Provider agrees to indemnify and keep indemnified the Client against all loss, costs, proceedings or damages whatsoever arising out of or in connection with any breach by the Service Provider of its obligations under the Modern Slavery Act 2015.”

whg will only trade with those who fully comply with this Policy or those who are taking verifiable steps towards compliance. We will assess any suspected instances of non-compliance on a case-by-case basis and take appropriate remedial action.

Recruitment & Selection Policy

Our recruitment and people management systems are designed to ensure that all prospective employees are legally entitled to work in the UK. There are mechanisms in place for colleagues to access support if they are experiencing any type of abuse once in our employment.

Safeguarding Policy

We have a Safeguarding Policy in place to ensure that all suspected cases of neglect or abuse are investigated and reported. We also have number of designated Safeguarding Officers.

Whistleblowing Policy

Our Whistleblowing Policy provides advice to colleagues and Board and Committee Members about how to report any instances of malpractice within our organisation or supply chain.

Lettings Policy

When signing up new tenants we undertake a robust process to ensure that they are who they say they are which includes background and identification checks. Our Tenancy Services Team will always investigate any allegations from customers or the wider community regarding potential tenancy fraud.

4. Training

We are committed to raising awareness amongst colleagues about anti-slavery and human trafficking and have included it within mandatory online safeguarding training for all colleagues. This topic will continue to be a regular feature in our Equality, Diversity and Inclusion training plans.

Signed:



Danielle Oum
whg Chair

Date:

30/5/19