



## **Slavery and Human Trafficking Statement 2021**

### **1. Introduction**

- 1.1 The Modern Slavery Act 2015 places an obligation on any organisation with a turnover of more than £36 million to report annually on the steps that have been taken during the financial year to ensure that slavery and human trafficking are not taking place in their own business or their supply chain.

### **2. Structure**

- 2.1 Wythenshawe Community Housing Group Limited (WCHG) is the parent entity. The Group did comprise three Registered Providers, with Willow Park Housing Trust and Parkway Green Housing Trust, but following a group consolidation on 31 March 2021, there is now one sole Registered Provider in the Group – Wythenshawe Community Housing Group Limited, with two subsidiary companies:
- Garden City Design & Build Limited (GCD&B) and;
  - Garden City Trading (GCT).

### **3. Business**

- 3.1 The Group's principal activities are the development and management of affordable housing through its Subsidiaries.
- 3.2 The Group manages and delivers major refurbishments and quality services to c13,700 homes in Wythenshawe. For the duration of 2020/2021 the Group's head office was at Wythenshawe House, in Wythenshawe and the vast majority of its properties are situated within five miles of the head office. The Group has charitable status and operates primarily as a social landlord, providing affordable general needs housing.

### **4. Supply Chain**

- 4.1 Each supplier regardless of their turnover is asked on a bi-annual basis to confirm that they are compliant with the requirements of the Act and that they have assurances that their supply chain is also compliant.
- 4.2 All suppliers are registered with Transparency in Supply Chain (TISC) to allow for additional checks and notification of any breaches of the Modern Slavery Act to be provided to WCHG.

4.3 With regard to employment law, human rights and including the Modern Slavery Act 2015, we will continually review our existing compliance and risk management process. This will determine associated risk, detection and prevention of modern day slavery and human trafficking within our supply chain for products and services to the organisation.

4.4 Staff receive ongoing training to identify and report any causes for concerns that they see. This is delivered through the Group's Safeguarding Policy and reporting tools.

## **5. Relevant Policies**

5.1 The Group has zero tolerance to slavery and human trafficking and is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business. The Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. There are a number of strategies and policies that contribute to the detection and prevention of modern slavery and human trafficking, as detailed below.

5.2 The Group's People Strategy makes clear the values of the Group and how they will be used to ensure that staff have the right skills and attitude to challenge appropriately when they see issues that need to be addressed. The Group's workforce are engaged and committed to the corporate objectives and support the delivery of the Modern Slavery Statement.

5.3 Relevant policies are as below:

- Anti Fraud Policy;
- Anti Bribery & Corruption Policy;
- Anti Money Laundering Policy;
- Critical Incident Reporting and Escalation Policy;
- Domestic Abuse Policy;
- Inclusion Strategy;
- Gas Maintenance and Safety Management Policy;
- Involvement Strategy;
- Recruitment and Selection Policy;
- Safeguarding Policy;
- Procurement Strategy & Policy;
- Tenancy Support Strategy;
- Whistle Blowing Policy.

## **6. Due Diligence processes in relation to Slavery and Human Trafficking**

6.1 WCHG acknowledges its responsibility under the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

6.2 During the past financial year, WCHG took precautions to ensure that it did not forge commercial relationships with any business knowingly involved with slavery or human trafficking.

- 6.3 WCHG will expect all who have, or seek a commercial relationship to familiarise themselves with The Modern Slavery Act and our anti-slavery values and act consistently within these.
- 6.4 All suppliers to the Group will be asked to confirm that they are compliant with the Modern Slavery Act 2015 on a bi-annual basis. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored.
- 6.5 The Group's recruitment process is open and transparent and includes direct communication with candidates to discuss the role and the terms and conditions. As part of the new starter process, all identities are checked and personal bank accounts confirmed for payment.
- 6.6 The Group Procurement Manager will ensure that all formal tenders are compliant with the requirements in the Act and will further develop audits for those suppliers with a higher risk of slavery or human trafficking.

**7. Parts of the business and supply chains where there is a risk of modern slavery taking place and how those risks have been assessed and are being managed**

- 7.1 The Group ensures that it receives relevant paperwork from all members of staff to ensure that they have the right to work and pays above the national living wage.
- 7.2 The Group promotes its Whistle Blowing Policy for staff to report any areas of concern.
- 7.3 All formal tenders will include clear reference to the obligations of providers to meet the standards set out in the Modern Slavery Act.
- 7.4 The Group's procurement activities take place in England and contractors and suppliers are mainly UK based. We work with a range of partners, contractor, suppliers and volunteers to deliver the Group's strategic objectives.
- 7.5 Some of our suppliers are potentially at a higher risk than other, for example recruitment agencies, repairs and maintenance companies and development firms. The Group ensures that only reputable firms are entered into contract with and it engages with the companies involved to ensure that their goods, materials and labour-related supply chains fully comply with the Modern Slavery Act 2015 are transparent, accountable and auditable.

**8. Effectiveness in ensuring Modern Slavery is not taking place, measured against appropriate performance indicators**

- 8.1 Performance will be monitored by the following key metrics:
- Whistle Blowing incidents related to Modern Slavery;
  - Incidents reported to Board;
  - Refresher training and briefings provided to staff.
  - Safeguarding referrals for Modern Slavery

## **9. Training**

- 9.1 All staff will receive a refreshed briefing on the importance of the Modern Slavery Act and the obligations that the Group has. This will also enable them to identify potential victims and how the Group can support them. The Group's Safeguarding Policy underlines the commitment of the Group to support vulnerable or exploited individuals.
- 9.2 Every September the Group runs Safeguarding September which reinforces the Group's commitment to protecting the most vulnerable in society and support staff in the identification of causes for concern.

## **10. Approval & Dissemination**

- 10.1 This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes WCHG's Slavery and Human Trafficking Statement for the financial year ending 31st March 2021.
- 10.2 This statement must be approved by the Board, be signed by a Director and published (or at least for there to be a link to it) on a prominent place on the Group's websites (previous years are available upon request).

Signed

A handwritten signature in black ink, appearing to read 'D Walker', written over a faint dotted line.

Bishop David Walker (Chair of Group Board)

27 September 2021