



## **Slavery and Human Trafficking Statement 2017**

### **1. Introduction**

- 1.1 The Modern Slavery Act 2015 places an obligation on any organisation with a turnover of more than £36million 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 company established (1 April 2013) with two Subsidiaries, Parkway Green Housing Trust (PGHT) and Willow Park Housing Trust Limited (WPHT).

### **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 c13,500 homes in Wythenshawe. For the duration of 2016/2017 the Group's head office was at Wythenshawe House, in Wythenshawe and all 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 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.

### **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.
- 5.2 Relevant policies are as below:
- Whistle Blowing Policy

- Safeguarding Policy
- Recruitment and Selection Policy
- Involvement Strategy
- Tenancy Support Strategy
- Anti Fraud, Bribery, Corruption and Money Laundering Policy
- Gas Maintenance and Safety Management Policy
- Critical Incident Reporting and Escalation Policy
- Domestic Abuse Policy
- Equality and Diversity Strategy

## **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 WCHG will 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 As part of the companies due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier.
- 6.5 All suppliers to the Group will be asked to confirm that they are compliant with the Modern Slavery Act 2015. 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.
- 6.6 This assurance will be undertaken on an annual basis in order to provide the Group that it is meeting its obligations under the Act.
- 6.7 The Group Procurement Manager will ensure that all new suppliers 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 As part of the appointment of new suppliers they will be ask to provide information to support their compliance with the obligations of the Modern Slavery act 2015.

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

## Appendix A

8.1 Performance will be monitored by the following key metrics:-

- Whistle Blowing incidents related to Modern Slavery.
- Incidents Reported to Board
- Training and Briefings Provided to staff

## 9. Training

9.1 All staff will receive a briefing on the important 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 Groups Safeguarding Policy underlines the commitment of the Group to support vulnerable or exploited individuals.

## 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 current financial year.

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.



A handwritten signature in black ink, consisting of a stylized 'N' and 'W' followed by a horizontal line extending to the right.

Signed:

Date: 25<sup>th</sup> September 2017

Nigel Wilson, Group Chief Executive