



Places to live. Space to grow.

Modern slavery and human trafficking statement

2025/26

Introduction

West Kent Housing Association (West Kent) is committed to identifying, preventing, mitigating and remediating the risks of modern slavery within our organisation, our supply chains and the communities we serve.

As a Relevant Commercial Organisation as defined by Section 54 of the Modern Slavery Act, we seek to ensure there is transparency in our practices and supply chains, consistent with our disclosure obligations. We recognise modern slavery as a serious crime and a safeguarding issue and are committed to acting ethically, transparently and responsibly, enforcing effective systems and controls to minimise the risk of exploitation and taking a victim-centred approach to supporting those who may be affected.

We are committed to continually raising our standards and practices in assessing and monitoring those that work with us and for us. We expect the same high standards from all our staff, contractors, suppliers and business partners in any capacity.

This statement sets out the steps we have taken, and actions we intend to take, to identify and mitigate the risk of modern slavery in connection with our operations in the financial year ended 31 March 2026.

Organisational structure and business function

West Kent consists of West Kent Housing Association, and West Kent Ventures Limited.

West Kent Housing Association is registered with the Financial Conduct Authority under the Co-operative and Community Benefit Societies Act 2014 and is registered with the Regulator for Social Housing as a social housing provider. As a Registered Social Landlord, West Kent Housing Association is a contracting authority and subject to the Public Contract Regulations 2015.

West Kent Ventures Limited is a wholly owned commercial subsidiary which is currently dormant.

INK Development Company Limited, a joint venture subsidiary, has now been wound down, following a decision by the INK Board on 27 September 2024.

West Kent owns and manages over 8,500 properties and employs approximately 360 staff. Our main function is to supply housing to people with a housing need, with the objective of being the leading community provider of affordable homes in Kent. The information provided below

describes the systems and controls which have been in place in the last year to identify and mitigate the risk of modern slavery and human trafficking from occurring in our operations, supply chains and communities.

Areas of risk

West Kent operates exclusively within the South East of the United Kingdom. We have identified that, while the overall risk of modern slavery occurring within our organisation or supply chains is considered relatively low, the following areas pose a higher risk:

- contracted (and subcontracted) labour in relation to construction and property maintenance; and
- our assets, specifically the homes we provide, being used to facilitate human trafficking and modern slavery.

We take a preventative approach to identifying and responding to modern slavery risks and have in place systems to:

- identify and assess potential risk areas in our business operations and supply chains. The Risk and Governance function is responsible for developing our risk assessment, taking into account external legal advice and from other functions across the organisation. The risk assessment is updated annually and scrutinised by the Executive Team and Audit and Risk Committee. Following the review in November 2025, we plan to embed modern slavery risk within our overall risk management framework and quarterly internal controls review cycle during 2026/27;
- mitigate the risk of slavery and human trafficking occurring in our homes and supply chains;
- monitor potential risk areas in our business operations and supply chains;
- enable reporting and handling of suspected modern slavery through established internal safeguarding and reporting routes, including reporting to external agencies; and protect whistleblowers.

Procurement and supply

West Kent will never knowingly deal with any business involved in slavery or human trafficking. We continue to use our standard forms of contract to ensure that potential future suppliers are aware of West Kent's position on slavery and that the terms set out our expectation that suppliers will be compliant with the requirements of the Modern Slavery Act (2015). These were all reviewed by external legal advisors in April and May 2025 and updated where required to ensure compliance with all current legislation. During 2025/26, new processes were implemented to consult the Exclusions and Debarments lists prior to each tender, to ensure no suppliers who have contravened Modern Slavery legislation are included. Mechanisms remain in place to terminate contracts where involvement in slavery has been discovered.

Our supplier due diligence checks continue to include a series of questions, asked early in a tender process for contracts valued over £5,000 plus VAT, which require new suppliers to make a declaration regarding their own policies and procedures as well as on behalf of their supply chain where applicable. Our questionnaire asks prospective suppliers to describe how they ensure their supply chains with their sub-contractors are compliant. Our due diligence checks

include a whistleblowing factsheet for new suppliers, to provide a route for suppliers to report concerns. Suppliers whose turnover is below the threshold for reporting continue to be required to note and adhere to behaviours and reporting requirements set out in West Kent's own factsheet.

West Kent almost exclusively sources its goods and services from suppliers with short supply chains and operating within the UK. Some exceptions exist around Software Service contracts delivered from outside the UK. These are managed in accordance with all relevant requirements and are deemed to pose a low risk of modern slavery due to the nature of the service provided. Due diligence checks have been further updated to include questions asking suppliers to provide details of any key suppliers to their business known to be based outside the UK and a request for the supplier to provide a copy of their Whistleblowing Policy. To date, one prospective supplier with non-UK suppliers within their supply chain has been identified through the enhanced new supplier due diligence checks.

We have not yet assessed modern slavery risks across our supply chain, beyond Tier 1. However, looking ahead we will investigate opportunities for identifying risk within supply chains, particularly for those suppliers who are themselves Relevant Commercial Organisations as defined by Section 54 of the Modern Slavery Act (2015) and where new supplier due diligence checks have identified non-UK suppliers within the supply chain.

Employment

West Kent has robust procedures in place for vetting new employees and confirming their identities, which were validated through an internal audit of safeguarding in 2025/26. All staff who regularly work with residents have to complete a Disclosure and Barring Service (DBS) check. We ensure that all staff are eligible to work in the UK and only pay salaries directly into employees' personal bank accounts. All staff are paid at least the Real Living Wage. We have sufficient processes in place to ensure that we comply with UK employment law.

We will only work with employment agencies that are compliant with the Modern Slavery Act 2015 and this statement. In addition, as part of our tender process for appointing recruitment agencies to a preferred suppliers list, bidders are required to either a) outline their procedures to ensure that their employees are free from exploitation, or b) agree that they will adopt and implement West Kent's Modern Slavery policy and procedures.

Homes

We have identified the use of our properties to facilitate modern slavery as a risk. To use a West Kent property for any criminal, immoral, anti-social or illegal purpose is a breach of tenancy and one which we will enforce to ensure that our homes are not being used to facilitate modern slavery. We work in partnership with a number of organisations to share intelligence to increase our ability to identify where modern slavery may be taking place.

During the course of 2025/26, one suspected case of cuckooing was identified and investigated. The incident did not meet the threshold for classification as a modern slavery incident but support was provided to the individual, who was identified as vulnerable, by West Kent and external agencies. Regular updates on safeguarding, including modern slavery incidents and concerns, are provided to West Kent's Communities and Housing Committee.

We have sufficient procedures in place to ensure the appropriate allocation of our homes and carry out checks to confirm identities. Where a tenancy has been granted subsequent to a fraudulent application, we have appropriate mechanisms to end the tenancy.

Staff training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our businesses, we provide training to our staff on the risks of modern slavery and how to address them.

We have an e-learning module designed to help staff identify and report modern slavery, which is mandatory for all staff. Completion of the module is monitored by the Risk and Governance function and reported to the Board as a standard KPI and 98% of existing and new staff completed the training in 2025/26.

This is complemented by mandatory safeguarding awareness e-learning, which was introduced for all staff in 2025/26, to help them identify when someone they come into contact with needs help. Enhanced training is mandatory for staff whose work predominantly involves direct contact with residents.

Working practice

We have existing policies which contribute to preventing human trafficking and modern slavery, which are reviewed regularly to ensure they remain compliant with latest legislation.

These include:

- [Safeguarding Adults Policy](#)
- [Safeguarding Children Policy](#)
- Recruitment Policy
- Whistleblowing Policy
- Procurement Policy and Procedures
- Fraud Policy
- Anti-money laundering policy
- Tenancy Fraud Policy
- Anti-facilitation of Tax Evasion Policy
- Anti-Bribery and Corruption Policy

Our policies are communicated internally via our intranet site and externally via our website. Our Safeguarding Adults and Safeguarding Children Policies have been developed in consultation with residents.

Monitoring and evaluation

West Kent measures our effectiveness in managing modern slavery risk through the following Key Performance Indicators, which are monitored by the Risk and Governance, Procurement and Housing functions. Performance against all three KPIs is reported to the People and Appointments Committee and is included below:

- Training completion, 98% completion as at 7 April 2026 against a target of 100%;
- Number of modern slavery incidents identified and handled – no modern slavery incidents confirmed in year;
- Number of new suppliers identified, with non-UK suppliers in their supply chain – One new supplier identified. Modern Slavery compliance included in procurement.

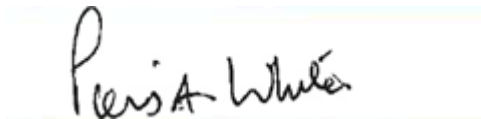
Governance

We have a dedicated compliance team, consisting of the Head of Risk and Governance, supported as necessary by the Procurement Manager, HR and representatives from the Housing and Property Services Departments, who have contributed to the development of this statement.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2025 and will be reviewed at least annually.

It was approved by our Board, which retains overall accountability for oversight of modern slavery risks and compliance with the Modern Slavery Act 2015. Oversight of activity is delegated to the People and Appointments Committee, which receives assurance on progress against the Modern Slavery Action Plan.

Signed

A handwritten signature in black ink, reading "Piers A White", is written over a light blue horizontal line.

Piers White
Chair of the Board of Management

10 June 2026