

Modern Slavery and Human Trafficking Statement **2023/24**

Red = updated wording

Westward Housing Group is committed to ensuring there is no modern slavery or human trafficking in our supply chains or any part of our business. We act ethically and with integrity in all our business relationships and undertake appropriate due diligence to identify and assess potential risk areas and mitigate the risk of slavery and human trafficking occurring.

Our business

Westward Housing Group is one of the main affordable housing providers in the southwest with **7,675** homes across Devon and Cornwall.

Westward provides support and intensive housing management services to more than 1,000 people in the region plus an alarm service to over 1,000 more.

Affordable Homes South West, the regional development partnership, enables Westward, as a member, to build new homes across the region to rent or sell affordably on a shared ownership basis.

Westward Property Services is our in-house building and maintenance contractor that employs around 60 local trades' people.

[More information about our business can be found here.](#)

Modern slavery is a crime and a violation of fundamental human rights.

It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking; all of which have in common the deprivation of a person's liberty by another or others to exploit them for personal or commercial gain.

Our approach

Westward exists to provide affordable homes for those in housing need, deliver related support services to vulnerable people and deliver maintenance services.

We have charitable status and do not have shareholders, which means that all surpluses generated go back into the delivery of great services, supporting our customers and building new homes.

Our ethos is reflected in one of our values 'show integrity' and our Equality Policy, which sets out our commitment to Equality, Diversity, and Inclusion in all our dealings as an employer, and provider of housing, support services, community services, and procurement partner. It states 'We are committed to treating all people with fairness and respect. We aim to create an inclusive environment where people are treated with dignity, inequalities are challenged, and we anticipate and respond positively to different needs and circumstances to enable individuals to achieve their potential. We want to be recognised as an organisation delivering inclusive accessible services and an employer and partner of choice.' The board's annual Equality Statement includes a look back at work completed and a plan for the coming year.

[Information about our approach to equality and diversity can be found here.](#)

Leadership and responsibility

Our board of Directors is ultimately responsible for the organisation and ensures we comply with the Modern Slavery Act 2015.

All staff are responsible for ensuring we meet the requirements of the Act.

We have safeguarding policies and procedures available on our intranet, and a safeguarding lead at senior management team level. We proactively work with staff and other agencies to identify, report and act on safeguarding concerns; these are fully investigated and reviewed, with any new learning shared with colleagues.

[Information about safeguarding can be found here.](#)

Staff awareness and training

During **2022/23** we used e-learning to provide training to all staff, and this training will continue throughout **2023/24**. Training covers adults and children to help staff identify people who may be at risk of abuse and know how to respond; separate e-learning training for all staff provides up to date information on modern slavery and human trafficking. **We refreshed Safeguarding lead training for our Safeguarding Panel to ensure our approach remains relevant and appropriate.**

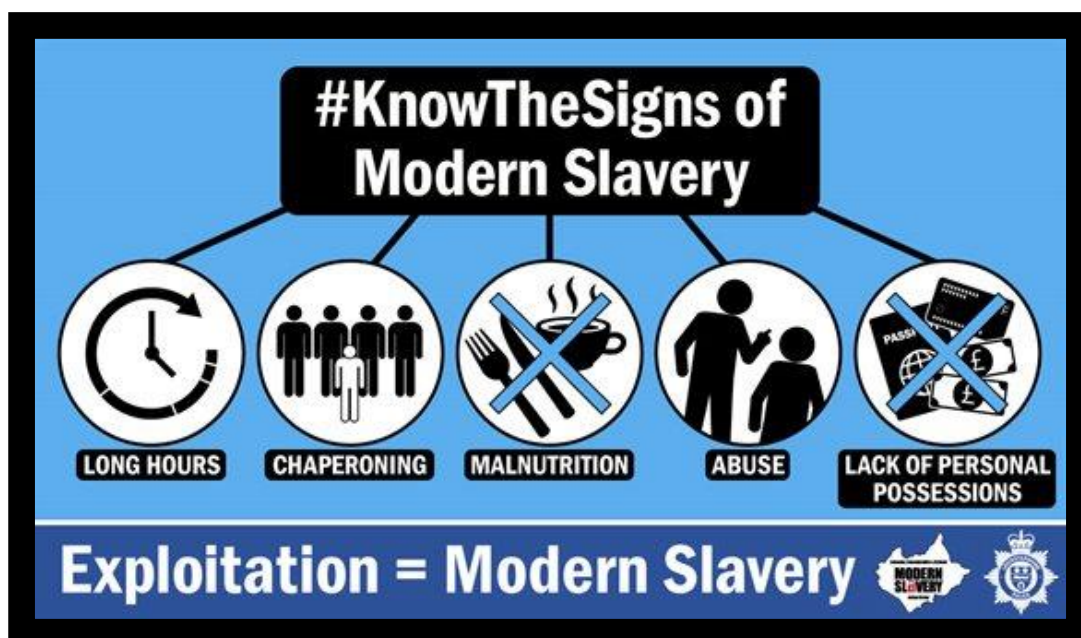
We provide an area of our intranet to raise awareness about modern slavery which includes the toolkits for reporting issues to Torbay and Plymouth councils. We also post the statement on our website, include information in all our newsletters and promote Anti Slavery Day on 18 October each year.

Additionally, we have information available that can be shared with customer groups and with staff teams to ensure modern slavery remains at the forefront of people's minds.

New staff take part in this training as part of their induction.

If you think someone is at risk through modern slavery, we encourage people to:

- Call 999 if it's an emergency
- Call 0800 0121 700 for help and advice any time (free from landlines and most mobiles)
- File a report at: <https://www.modernslaveryhelpline.org/report> you can do this anonymously if you are scared to give your name



Our supply chains

Last financial year we spent around £30 million on contracts and services with around 700 contractors who are predominantly based in the UK. We work with a number of consortia and frameworks and have procurement processes that are UK-compliant and a contractor code of conduct. Underpinning these

documents is Westward's code of ethics, which is based on that adopted by the Chartered Institute of Purchasing and Supply.

Our procurement questionnaire requires new suppliers to declare that they are not involved in slavery or human trafficking and have not been subject to any investigation in connection with any offence involving slavery or human trafficking. We also include provisions in our template contract documentation requiring our suppliers to take appropriate steps to ensure that there is no slavery or human trafficking in their supply chains.

We assess any evidence of non-compliance and take appropriate remedial action. We only trade with those who fully comply or those who are taking verifiable steps towards compliance.

[Information about our contractors and the procurement process can be found here.](#)

Human resource (HR) practices

Our HR practices comply with current employment legislation and good practice, including a 'Right to Work in the UK' check. Policies are updated and reviewed on a risk basis and at least every three years, they are approved by our Executive Team. Staff are updated on changes in policy via our monthly staff briefings and managers' policy briefings. New managers are introduced to policies as part of their induction.

Temporary workers are sourced via a reputable agency, who meet the requirements upon our suppliers to make a declaration in regard slavery or human trafficking, as detailed above.

We consult with our Staff Forum (including representatives from across the business).

We pay at least the National Living Wage to **all employees, apart from those completing apprenticeships**

A Health and Safety Group ensures compliance and good practice across the business; they also work with our supply chain.

Information about [recruitment](#) can be found here and our key HR policies can be requested by emailing our People team at HR.files@westwardhousing.org.uk

Principal risks, mitigations, and actions

We consider our principal risks as:

- smaller contractors or work which is sub-contracted in our supply chain
- customers impacted by modern slavery and human trafficking

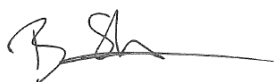
These risks are mitigated by our action plan and existing procedures and policies.

Statement sign-off

This statement is made pursuant to the Modern Slavery Act 2015 section 54 and covers the financial year 1 April **2022** to 31 March **2023**. This statement has been collated by a review group of key staff, reviewed by the Executive Team, and approved at the **15 June 2023** Board.



Brian Aird, Chair of the Board



Barbara Shaw, CEO

Modern Slavery Action Plan outturn 2022/23

Ref	Action	Lead	Timescale	Progress updates
1.	Update report to Westward board.	Governance Manager	Jun 2022	Complete
2.	Publicise statement via our stakeholder newsletter 'Westward Way', customer newsletter 'Moor to Sea', staff briefing and staff 'Newshound'. Mark a national/regional anti-slavery day to ensure stakeholders are reminded and to mitigate customer impact.	Governance Manager and Communications Manger	Oct 2022	Moor to Sea customer newsletter – Autumn 2022 modern slavery statement article. Newshound/Staff Briefing/intranet – modern slavery act and statement. Torbay Racism Review publicised and reported on – Oct 2022. 18/10/2023 anti-slavery and human trafficking day marked. Stakeholder newsletter - promoted annual anti-modern slavery and human trafficking statement and campaign in Sept 2022. Social media – promoted the above on social media.
3.	Continue to monitor compliance with modern slavery, human trafficking and safeguarding at contractor review meetings using contractor review checklist and with support services managing agents.	Directors of Housing, Property, Development and Support	Mar 2023	As part of compliance checks, colleagues have a checklist for monitoring purposes. All advised as complete at last check. Support also confirms its approach to safeguarding and modern slavery in tenders and contracts to deliver services.
4.	Modern slavery to remain an agenda item for Safeguarding Panel and a mandatory eLearning training course as part of induction and then on a regular basis. Any lessons learnt will be agreed with the Safeguarding Panel and circulated via staff briefing.	Director of Support (as safeguarding lead)	Mar 2023	Links for modern slavery sites for Devon and Cornwall are included regular information to Panel agenda. Named contact now in place on Safer Devon Partnership (SDP). Modern slavery remains part of mandatory training. Lessons learnt in the South West will be shared following contact with SDP. Annual good practice/lessons learnt review on forthcoming Panel agenda.

Modern Slavery Action Plan 2023/24

Ref	Action	Lead	Timescale
1.	Update report to Westward board.	Governance Manager	Jun 2023
2.	Publicise statement via our stakeholder newsletter 'Westward Way', customer newsletter 'Moor to Sea', staff briefing and staff 'Newshound'. Mark a national/regional anti-slavery day to ensure stakeholders are reminded and to mitigate customer impact.	Governance Manager and Communications Manager	Mar 2024
3.	Continue to monitor compliance with modern slavery, human trafficking and safeguarding at contractor review meetings using contractor review checklist and with support services managing agents. Ensure all procurement processes continue to safeguard vulnerable individuals and groups against modern slavery and related abuse. Ensure all who participate in our procurement process commit to publishing their own annual statement or commit to following Westward's approach to modern slavery and as part of procurement are required to provide this update annually.	Directors of Housing, Property, Development and Support Procurement Manager	Mar 2024
4.	Modern slavery to remain an agenda item for Safeguarding Panel and a mandatory eLearning training course as part of induction and then on a regular basis. Any lessons learnt will be agreed with the Safeguarding Panel and circulated via staff briefing.	Director of Support (as safeguarding lead)	Mar 2024