whg Anti-Slavery and Human Trafficking Statement 2022

Introduction

whg is a group registered with the Regulator of Social Housing and the Charity Commission. whg is the trading name of Walsall Housing Group, which is a registered provider of social housing, owning and managing over 21,000 homes across the West Midlands. We employ around 750 colleagues, who support the provision of affordable, good quality homes and services to more than 50,000 customers.

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 2021/22 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.

This Statement is approved by whg's Board and applies to all organisations within the Group:

Walsall Housing Group Limited
Anthem Homes Limited
Anthem Lovell LLP
whg Trading Company Limited
whg Treasury PLC
whg Developments Limited
Cricket Close LLP
Woodlands Management Company (Harrowby) Limited

The Statement is reviewed and updated annually.

Identification of Risks

We have identified three key areas of our business activity where there is a risk that modern slavery and human trafficking could occur:

- In our supply chains
- In our homes
- Through our recruitment activities

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. Many of the controls we have in place are monitored through a range of mechanisms including internal audits and compliance checks.

Our Supply Chains

We have a central Procurement Team and risks are managed through supplier sourcing and selection processes in accordance with the Public Contracts Regulations 2015, and ongoing during contract management. In order to ensure that all those in our supply chain and contractors comply with our commitment we have in place a supply chain compliance programme. This includes:

- Questions on compliance within tender selection questionnaires. requiring a proactive approach from the contractor with an obligation to notify whg of any non-compliance.
- The Procurement Policy is explicit about the obligations of contractors and suppliers in relation to the Modern Slavery Act.
- Incorporation of terms requiring adherence to the Modern Slavery Act into contracts.
- Due diligence of existing contractors to achieve assurance.

whg will only trade with those who fully comply 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.

During the past year we have introduced further controls:

- We are currently undergoing a trial of contract management software which provides documented certification that contractors are providing ongoing compliance with the Modern Slavery Act. We aim to roll this software out to all operational contracts within the next 12 months
- Controls are embedded within our Planned Maintenance contracts. Modern Slavery will be a topic for discussion at upcoming “Meet the Buyer” days to promote awareness and compliance with our delivery partners and throughout the supply chain

Our homes

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. We always fully

investigate allegations or complaints from customers or the wider community regarding potential tenancy fraud, which could be a sign of human slavery or trafficking.

As a community-based housing provider, with the majority of our homes in Walsall, we have a good understanding of our neighbourhoods. We have excellent partnership links with the Police, the Local Authority and other local agencies, with data sharing arrangements in place as appropriate.

We also have an Anti-Money Laundering Policy in place which provides controls to mitigate the risk of our properties being used as accommodation for the victims of trafficking or being sold to criminals for this purpose.

Recruitment and People Management

Our recruitment and people management procedures ensure that all prospective colleagues are legally entitled to work in the UK and are safeguarded from any abuse or coercion once in our employment.

All recruitment is managed by our experienced and professionally qualified, in-house Human Resources Team who ensure that robust pre-employment checks are conducted. These include proof of eligibility to work in the UK, employment references, and DBS checks. We do not engage casual workers and do not operate zero hours contracts. We only use reputable recruitment agencies which are required to demonstrate that they have anti-modern slavery policies and procedures in place.

There are a range of mechanisms in place for colleagues to access support if they are experiencing any type of abuse once in our employment which include:

- *Safeguarding Policy* - ensures that all suspected cases of neglect or abuse are investigated and reported. We also have a number of designated Safeguarding Officers.
- *Whistleblowing Policy* – provides advice about how to report any instances of malpractice within our organisation or supply chain. We have appointed the Deputy Chair of the Board as the Board Member with specific duties relating to whistleblowing, including being a senior point of contact for whistleblowing reports. We have also set up email inboxes specifically for whistleblowing reports.

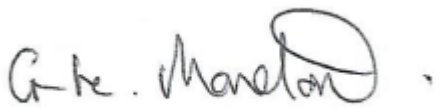
Education and Training

Our aim is to make modern slavery, and safeguarding more widely, everyone's business. We actively encourage and support colleagues to look out for, and report potential signs of slavery, human trafficking or other human rights abuses, and support victims to access specialist services.

All colleagues are required to undertake mandatory safeguarding training annually and specialist training is provided to teams as appropriate. Our current mandatory safeguarding offer is under review, we are currently exploring replacing the existing offer with a more well-rounded approach to the topic. We aim to update the current e-learning module during 2022/23.

Modern Slavery covers a wide range of abuse and exploitation, there is not a one size that fits all approach to training. To ensure that our Designated Safeguarding Officers are aware of the many forms of exploitation that constitutes Modern Slavery they receive regular updates and training from Walsall Safeguarding Partnership on a range of aspects of safeguarding which includes exploitation and forms of trafficking.

Signed:



Gary Moreton
Chair of whg Board

Date: 16 June 2022