

whg Anti-Slavery and Human Trafficking Statement 2024/2025

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 just under 23,000 homes across the West Midlands. We employ around 800 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 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 2024/25 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

whg complies with the Procurement Act 2023 and The Procurement Regulations 2024 and accordingly our supplier sourcing and selection processes are undertaken in accordance with the Public Contracts Regulations 2015. Contract Managers manage the ongoing relationships with our

appointed suppliers to ensure ongoing compliance. In order to ensure that all those in our supply chain and contractors comply with our commitment the following actions are undertaken:

- Questions on compliance form an integral element of the evaluation of suppliers, with suppliers required to self-certify meeting the minimum standards required.
- Suppliers who are classified as a relevant commercial organisation subject to Section 54 of the Modern Slavery Act 2015 are required to demonstrate meeting their obligations to publish a statement as required by Section 54 of the Modern Slavery Act. For suppliers who are not classified as a relevant commercial organisation subject to Section 54 of the Modern Slavery Act 2015, where the commodity is deemed as being at a higher risk of modern slavery occurring, (despite where the bidder may not be classified as a relevant commercial organisation subject to Section 54 of the Modern Slavery Act 2015), we require assurances in respect of the organisations' approach to ensuring it takes positive action to prevent and eliminate modern slavery in its supply chains.
- Contract terms and conditions set out the requirement for suppliers to be compliant with the Modern Slavery Act at all times and an obligation to notify whg of any non-compliance.

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.

whg is committed to eradicating modern slavery in its supply chains and is working towards developing greater scrutiny and due diligence controls.

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 and Fraud 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 employees 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 (where required). 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.
- Colleague Domestic Abuse Policy – provides support to colleagues experiencing or at risk of domestic abuse.

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. We have two safeguarding modules via noodle (Learning Management System) which are specifically targeted at safeguarding within Social Housing.

Modern Slavery covers a wide range of abuse and exploitation, there is not a one size that fits all approach to training. We are currently re-evaluating our wider safeguarding offer to support the ongoing development of our Designated Safeguarding Officers and the specific learning needs of individual roles and teams.



Signed:

Chair of whg Board

Date: 7 May 2025