Modern Slavery Statement

Modern Slavery Statement – Selwood Housing This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps Selwood Housing have taken to ensure that our business as well as our supply chains are free from slavery and human trafficking during the financial year ending 31st March 2024.

Introduction
Modern slavery and human trafficking is an issue that exists in both developed and developing economies and across business sectors. Selwood Housing has a zero-tolerance approach to slavery, servitude, forced labour and human trafficking (modern slavery), and is committed to conducting business with honesty, integrity and treating everyone with dignity and respect. Our existing policies, processes and contracts show that we embrace the principles and aims of the Modern Slavery Act 2015.

We are committed to working with our partners and suppliers to raise awareness and understanding of modern slavery and eliminating the practice from the supply chain. This statement details the actions we have taken this financial year to achieve this.

Our organisational structure and operations
Selwood Housing is a provider of local affordable homes in the Wiltshire and immediate surrounding area. Our head office is based in Trowbridge. As a housing association, we own and manage over 7000 homes for rent and shared ownership. We have been a vital part of our communities for over 30 years and know the difference a stable home can make. Affordable, safe, secure homes give people a foundation on which to build their lives. The range of homes we provide, from rented to shared ownership, sheltered accommodation and care homes means we help many local people.

The Selwood Housing Group is made up of Selwood Housing, Silcoa, Selwood Devco and Cottsbury Homes. Our team consists of over 300 local people who really get to know our customers and are passionate about helping them. By listening to what our customers say, we are continually improving our services. Put simply, we are here to play our part in solving the UK's housing crisis, as a long-term partner and investor in our communities. More information can be found here: https://www.selwoodhousing.com/about-us/who-we-are/

The Group has a total annual turnover of around £53m.

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Nature of our supply chains
We have systems in place to identify and assess potential risk areas in our supply chains, mitigate the risk of slavery and human trafficking occurring in our supply chain, and to protect whistle-blowers.

We manage projects and procurements where services and products ae sourced from suppliers. Most of these products are not sourced by us directly but are sourced by our contracted suppliers of services, goods and works. As an organisation that does not wish to work with any business knowingly involved in slavery or human trafficking in any part of its operations, we are taking the following steps:

- Requiring new suppliers appointed by tender, direct award or framework, 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.
- Including 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 have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, we have in place a rigorous supply chain compliance programme. This consists of:

- Asking tenderers to declare that they and all their suppliers are compliant with the Modern Slavery Act 2015
- Asking our suppliers to declare whether they or any of their suppliers have been subject to prosecution under the Modern Slavery Act 2015
- Ensuring all contractual agreements refer to adherence to the Modern Slavery Act 2015

We will assess any evidence of non-compliance and will take appropriate remedial action. We will only trade with those who fully comply with this statement and the terms of our contracts for those who are taking verifiable steps towards compliance. Policies relating to slavery and human trafficking

Policies
We have a robust governance structure which oversees the development and implementation of policies that discuss our commitment to tackle modern slavery. These include our Group Financial Regulations (Anti-fraud and Anti-corruption, Anti Money Laundering and Gifts and

Hospitality), Whistleblowing policies, Procurement Strategy, plus our Contractor service level agreements.

We also have robust People and Organisational Development policies and procedures in place and an employee Code of Conduct to ensure the fair treatment of all colleagues. We comply with all applicable employment legislation relating to employee terms and conditions, including payroll, the use of agency employees and we invest in supporting the health and wellbeing of our staff.

Our Safeguarding Adults and Child Protection Policy includes specific reference to modern slavery and how to respond to and escalate any concerns.

Risk assessment

There are a number of ways Selwood Housing assess and manage the risk of modern slavery in our own operations. We have policies and processes in place to minimise the risk of modern slavery among the colleagues we employ directly, and our people, plus procurement functions are working together to minimise the risk of modern slavery among colleagues who aren't directly employed by us.

Selwood Housing encourages its employees and suppliers (where permitted by law) to report certain matters confidentially or anonymously without fear of retaliation, including circumstances that may give rise to slavery or human trafficking concerns (please refer to our Whistleblowing, Safeguarding, ASB and Tenancy fraud policies).

The UK Government also provides a 24-hour modern slavery helpline that victims, employers and members of the public who may encounter modern slavery can call for expert support and advice. Telephone 0800 0121 700

Due diligence processes

Selwood Housing undertakes due diligence when considering taking on new suppliers or where it works in partnership with other organisations. Our due diligence and reviews include:

- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers if needs be and requirement to implement action plans.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our

supplier service level agreement, including the termination of our business relationship.

Staff training

We provide training to all staff to ensure that they understand the risks of modern slavery and human trafficking infiltrating our business or supply chains and effectively operate our policies and procedures aimed at mitigating this risk. The course provided by Skill boosters includes

- the definition of 'modern slavery'
- key industries at risk, with a focus on construction
- the main provisions of the Modern Slavery Act
- what the Act means for organisations who do business in the UK
- how to spot and report instances of modern slavery.

We also require our key business partners and suppliers to provide such training to their own staff**.**

Monitoring

We intend to use the following key performance indicators (KPI's) to monitor how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains.

- Percentage of staff completing the modern slavery training course (target 100%)
- Numbers of modern slavery reported incidents by employees
- Numbers of suppliers not meeting the required due diligence processes outlined above
- A periodic review of our policy compliance by our internal auditors (currently TIAA)

Board Approval

This statement was approved by the Selwood Housing Group Board on 4th July 2023 and will be reviewed and updated, as appropriate, on an annual basis.

Signed: SF. Lewis

Date: 3 July 2024

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Decision-making record

Date	Meeting / Minute Reference	Version / Amendment
12/12/17	Exec team approval	1
19/12/17	Board approval	1
18/12/18	Exec team approval	2
13/08/19	Exec team approval / board	3
06/08/20	Exec team / Board approval	4
07/07/21	Exec team / Board approval	5
06/07/22	Exec team / Board approval	6
05/07/23	Exec team / Board approval	7
03/07/23	Exec team / Board approval	8
03/07/24	Exec team / Board approval	9