Slavery and Human Trafficking Statement

Introduction

This statement outlines the steps we have taken to ensure compliance with the Modern Slavery Act 2015 (MSA) and minimise the risks of any association with practices which undermine the principles of safety and dignity for all people particularly with respect to people from vulnerable groups.

It reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Wandle and its subsidiaries will not tolerate slavery or human trafficking in any of its forms, in any aspect of our business.

Embedding the Modern Slavery Act ensures that Wandle's employees and customers are treated fairly and are not subject to such practices.

Organisational Structure

Wandle Housing Association Limited (Wandle) is a housing association, incorporated as a Charitable Registered Society, managing circa 7500 homes in South East London, with over 50 years of experience. It is also the parent company of three subsidiaries, which are limited companies. These are:

a. Delta Homes Limited, a wholly owned subsidiary which provides a building and property development service.
b. Ravensbourne Developments Limited, a wholly owned subsidiary which is a property development company focused on building and selling homes for outright sale. This subsidiary is currently dormant.
c. Unitworthy Property Management Limited, which holds the head lease and provides management services for one block of properties and is majority owned by Wandle.

The wholly owned subsidiaries donate by way of Gift Aid any profit made to Wandle.
Wandle has circa 240 employees, including contractors and consultants.

Procurement

Since August 2023 Wandle's procurement support services have moved in-house. As part of this move, the Procurement team have developed our internal rules and are developing a procurement strategy. These documents specify our commitment to eradicating Modern Slavery within our supply chain.

It is anticipated that by the end of 2024 Wandle will have established a procurement shared service, which will be delivering procurement support back into Wandle.

Most of Wandle's procurement exercises (tender and quotations) are undertaken via an e-Procurement platform called Delta e-Sourcing. Within the e-Procurement platform, a standard selection questionnaire must be filled in by all participating suppliers (for all advertised opportunities) which includes a designated section on modern slavery.

In instances of Wandle making use of pre-procured frameworks administered by other external organisations we require them to do so in accordance with Public Contract Regulations which, in turn, requires compliance with the MSA and the satisfactory completion of the standard selection questionnaire. From October 2024 this will also be in compliance with the Procurement Act 2023.

We have strengthened contract management and administration practises through resourcing, training, and awareness. Checking for Modern Slavery compliance is also part of the due diligence process for contract mangers before we enter a contract with a new supplier.

Wandle's procurement team maintain a forward procurement plan which provides a continual review of all formally procured contractual relationships.

We also ensure that all suppliers pay wages in line with the Living Wage Foundation's levels for both London and the rest of the country. This requirement is included in the terms and conditions of our procurement contracts.

Our standard checks on supplier's compliance with our contractual requirements include an annual confirmation of payment of the Living Wage Foundation's wage levels.

Wandle will continue to review its procurement policies regarding tenders and contracts, to ensure they reflect best practice, and to mitigate against the risk of modern slavery.

Policies in relation to slavery and human trafficking

We have policies and procedures in place that reflect anti-slavery and human trafficking. These include:

a) Safeguarding Policy
b) Supplier code of Conduct

c) Procurement Procedure Rules and Strategy
d) Whistleblowing Policy
e) Domestic Abuse Policy (Residents and Service Users)

Training on modern slavery and trafficking

All new starters are required to undertake online safeguarding training to build awareness and understanding of our vulnerable customers, how to identify potential risk factors and at-risk groups, including signs of exploitation and how to respond to them. The policy and training help to strengthen our support to staff to spot any abuse which may include modern slavery. We did not have any reports of modern slavery during the year.

Due Diligence

With regards to our workforce, all Wandle employees are paid at least the London Living Wage. We check identification and ensure all employees have the right to work in the UK. We also conduct DBS checks for all employees working with vulnerable people. These requirements are passed on to any employment agencies used by Wandle. Additionally, salaries will only be paid into bank accounts which are in the employee's name. We have engaged an external and independent organisation who can provide support and advice to staff with whistleblowing concerns, which include Modern Slavery. This additional support is available where staff do not feel able to raise concerns through internal channels such as their line manager or the Board's designated Whistleblowing point of contact.

As part of our initiative to identify and mitigate risk we work to:

- Identify and monitor potential risk areas in our business, supply chains and properties.
- Be aware of and consider the risk of Modern Slavery and cuckooing in relation to reports and investigations of subletting or tenancy fraud in our properties.
- Mitigate the risk of slavery and human trafficking occurring.
- Protect whistle blowers. We have an up-to-date whistleblowing policy and procedure, with a designated member of the board serving as a point of contact for Whistleblowing.
- Identify additional training for staff conducting tenancy audits to help spot signs of cuckooing.
- Develop a Modern Slavery risk assessment for procurement.

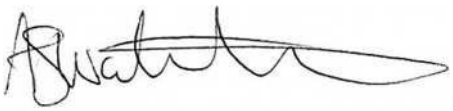
We continue to improve our blended repairs delivery model delivering repairs through a combination of:

a) Wandle's in house Repairs service.
b) Approved sub-contractors, who are sourced through our managed service provider and managed directly by Wandle.
c) A dynamic purchasing system, where checks are performed by the supplier who voluntarily publish their own Modern Slavery Statement.

Monitoring Effectiveness

We recognise that there is always more that we can do to prevent and detect modern slavery and human trafficking. Over the coming year we will continue to monitor the effectiveness of the systems in place to not tolerate slavery or human trafficking in any of its forms, in any aspect of our business. We will assess any evidence of non-compliance and will take appropriate remedial action. We will also ensure that this forms part of our enhanced contract management approach, particularly in line with areas of higher risk to modern slavery.

This Statement is made under section 54(1) of the Modern Slavery Act 2015. It was approved by Wandle's Board on xxxx and applies to all companies within the Wandle Group for the financial year ending March 2024



Chief Executive
On behalf of the Board
Date: 25/07/2024