



Modern Slavery and Human Trafficking Statement 2025/26

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 that undermine the principles of safety and dignity for all people, particularly 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 are 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 7,500 homes in South East London, with over 50 years of experience. There are four companies that Wandle Housing controls, and they all have the same objectives as Wandle regarding modern slavery. These companies are:

1. **Delta Homes Limited**, a wholly owned subsidiary which provides a building and property development service.
2. **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.
3. **Unitworthy Property Management Limited**, which holds the head lease and provides management services for one block of properties in Merton. Wandle holds the majority of shares in this company.

4. **Shared Services for Housing Ltd (SSfH)**, a separate legal entity which exists to deliver shared procurement and related services for its members. Wandle is a member and is recorded as the Person with Significant Control (PSC).

The wholly owned subsidiaries donate any profit made to Wandle by way of Gift Aid.

Wandle has circa 265 employees, including contractors and consultants.

Procurement

During the year, Wandle's procurement services were delivered by Shared Services for Housing Ltd (SSfH). SSfH is a subsidiary of Wandle; it is a shared service, formed in April 2025 to support its members to manage procurement and contracts more efficiently.

Most of Wandle's procurement exercises (tenders and quotations) are undertaken via an e-Procurement platform called ProContract (ProActis). 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 where Wandle makes use of pre-procured frameworks, dynamic purchasing systems or dynamic markets administered by other external organisations, we require them to do so in accordance with the relevant legislation, either the Public Contracts Regulations 2015 or the Procurement Act 2023, which, in turn, requires compliance with the MSA and the satisfactory completion of the standard selection questionnaire. From February 2024, Wandle is also compliant with new procurement regulations delivered through the Procurement Act 2023.

As part of competitive procurement processes, if tenders are considered abnormally low, this will be explored further with the bidder to ensure compliance with labour laws and practices.

We have strengthened contract management and administration practices through resourcing, training and awareness. Checking for modern slavery compliance is part of the due diligence process for contract managers before we enter into a contract with a new supplier. We also have guidance that, where any contract is considered high risk in terms of modern slavery, additional award questions are considered with advice from Procurement.

Wandle's procurement team maintains a forward procurement plan which provides a continual review of all formally procured contractual relationships. We also request that our 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.

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 our approach to anti-slavery and human trafficking. These include:

1. Safeguarding Policy
2. Recruitment and Selection Policy
3. Supplier Code of Conduct
4. Procurement Procedure Rules and Strategy
5. Whistleblowing Policy
6. Domestic Abuse Policy (Residents and Service Users)
7. Tenancy Management Policy

Wandle's policies, requirements and expectations for contractors are set out in our Supplier Code of Conduct and our Procurement Rules and Strategy.

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 regard 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 that are in the employee's name. We have engaged an external and independent organisation that can provide support and advice to

staff with whistleblowing concerns, including 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. All whistleblowing concerns are taken seriously and are reported, where appropriate, to the Audit and Risk Committee to ensure effective oversight and governance.

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

- a) Identify and monitor potential risk areas in our business, supply chains and properties.
- b) 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.
- c) Undertake tenancy visits to help spot signs of Modern Slavery and cuckooing in our properties.
- d) Protect whistleblowers. 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.
- e) Have in place robust housing management and enforcement activities that allow us to address risks through activities such as property inspections, tenancy enforcement and pre-tenancy checks.
- f) Undertake an annual review of activities that we undertake to identify if there are any growing patterns and trends which might lead to increased risk of Modern Slavery.

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

- Wandle's in-house repairs service.
- Approved subcontractors, who are sourced through our procurement adviser as part of our repair's contractor framework.
- A dynamic purchasing system, where checks are performed by suppliers who voluntarily publish their own modern slavery statements.

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 ensure that slavery or human trafficking is not

tolerated 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.

This Statement is made under section 54(1) of the Modern Slavery Act 2015. It was approved by Wandle's Board on 22 July 2026 and applies to all companies within the Wandle Group for the financial year ending 31 March 2026.

DocuSigned by:

C882499AE62845A...
Anne Waterhouse

Chief Executive
On behalf of the Board
Date: 1/9/2026