SAXON WEALD

Modern Slavery Statement 2024/25

First Approved: September 2017 **Author: Michael Chinn**

Last Revision: June 2025 **Next Review: June 2026**

1.0 Introduction and aim

1.1 The Modern Slavery Act 2015 (transparency in supply chains) came into force on 29 October 2015. Its purpose is to reduce and prevent slavery, servitude, forced or compulsory labour and human trafficking in the UK.

1.2 The Act requires commercial organisations (both listed and private), operating in the UK and with a turnover of £36m or more, to publish and make available a Modern Slavery Statement (on their websites).

1.3 The Modern Slavery Statement must be reviewed and approved annually by the organisation's governing body and cover the whole financial year. It must set out the steps taken to ensure that its business and supply chains are slavery free.

1.4 This Statement sets out Saxon Weald's approach towards preventing and tackling modern slavery, ensuring that modern slavery and human trafficking do not take place in our business or supply chains.

2.0 About Saxon Weald

2.1 Established in December 2000, Saxon Weald is a housing association managing homes across Sussex and Hampshire. We provide affordable rented and shared ownership homes for individuals and families, as well as properties exclusively for the over 55s. We also provide homes for market rent through our Weald Living brand.

2.2 Saxon Weald is a charitable Community Benefit Society, regulated by the Regulator of Social Housing. We are a not-for-profit company, with all income being re-invested in the management, maintenance and development of homes and services to our customers.

2.3 Saxon Weald is the parent of Saxon Weald Capital Plc and Weald Property Development Limited. Saxon Weald Capital Plc is a wholly owned subsidiary with the purpose of providing funding from the capital markets to on-lend to Saxon Weald. Weald Property Development Limited is a wholly owned non-charitable subsidiary set up to develop homes for open market sale. Since incorporation, Weald Property Development Limited has not traded and is dormant.

3.0 Definition

3.1 Saxon Weald defines modern slavery as: *Conduct that constitutes the offences of forced or compulsory labour and the unlawful trafficking of adults and/or children for illegal and/or immoral purposes.*

4.0 Modern Slavery Statement

Policy

4.1 Saxon Weald will take appropriate steps to ensure that everyone who works for the organisation has their fundamental human rights respected, and that any organisation we do business with upholds these principles.

4.2 We are committed to meeting our obligations under the Modern Slavery Act 2015. Our aim is to ensure that slavery and human trafficking do not exist in any aspect of our business and supply chains; as well as to demonstrate ethical practices that align with our corporate values and charitable status. To achieve this, Saxon Weald will:

a) Ensure that all reports and allegations of modern slavery are recorded, investigated and responded to quickly, confidentially and sensitively, involving the police and other relevant agencies and authorities as necessary.

b) Promote and make accessible a whistleblowing policy and procedure, which enables staff, residents and anyone working on our behalf to confidentially report concerns relating to modern slavery or human trafficking that may be occurring in our organisation, in any of our properties, or in our supply chain.

c) Assign a senior member of staff to be responsible for ensuring that the commitments made in this Statement are achieved and that Saxon Weald remains compliant with the Modern Slavery Act 2015.

d) Raise awareness of our approach to Modern Slavery by publishing our Statement in a prominent place on our website; as well as registering with the Modern Slavery Registry and submitting our annual Statement, each year, within the required timescale.

e) In making decisions on whether or not an individual is a potential victim or victim of modern slavery for the purpose of the National Referral Mechanism (NRM), we will follow the guidance set out in the Home Office document 'Modern Slavery: Statutory Guidance for England and Wales (under s49 of the Modern Slavery Act 2015) and Non-Statutory Guidance for Scotland and Northern Ireland'.

Recruitment, Employment and Training

4.3 As a responsible and ethical employer, Saxon Weald will:

a) Require all prospective employees to provide suitable documentation, which evidences their identity and verifies their entitlement to work legally in the UK.

b) As a minimum, pay our staff the appropriate national living wage and ensure that their terms and conditions of employment are clear, fair, reasonable and compliant with all relevant legislation.

c) Provide training on modern slavery and human trafficking to relevant staff, in order to raise awareness of how to recognise and report it, along with its implications on our business and the people affected.

Property Lettings and Management (due diligence)

4.4 We will reduce the risk of our properties being used to support and accommodate modern slavery by:

a) Requiring all persons applying for housing, either directly or via a local authority nomination to provide suitable documentation which evidences their identity.

b) Requiring all persons applying for our private rent accommodation to provide suitable documentation, which evidences their identity and entitlement to live in the UK, in line with Right to Rent legislation (as contained within the immigration Act 2014 and the Immigration Act 2016).

c) Verifying with our local authority nominating partners, that they have appropriate checks in place for applicants for housing.

d) Requiring tenants who are seeking permission to have a paying lodger to provide proof of that lodger's Right to Rent.

e) Actively encouraging our residents to report any unusual activities, which suggest that modern slavery may be occurring in our homes or neighbourhoods.

f) Ensuring that our staff are proactive and vigilant in recognising signs of modern slavery; taking appropriate action to investigate and address any potential issues that raise their concerns. This will include informing the relevant agencies and, if necessary, taking legal action to regain possession of a property, where it is suspected and/or evident that a serious breach of tenancy has occurred relating to modern slavery.

Supply chains (due diligence)

4.5 In outsourcing works, services and supply arrangements to external organisations, Saxon Weald expects the organisations we do business with to share our commitment to preventing and eliminating modern slavery and human trafficking. To help enforce and monitor this, we will:

a) Prior to entering into business arrangements, require all organisations with an annual turnover of more than £36m that provide goods, services or works to Saxon Weald, to provide us with an up-to-date copy of their Modern Slavery Statement and we will expect them to update their Statement annually, make it accessible on their website or available to us on request.

b) As part of our procurement process, require all new and prospective suppliers and contractors to declare that they, and to the best of their knowledge their supply chains, are not involved in any activities that could be considered "modern slavery", as determined by the Modern Slavery Act 2015. As well as to confirm that they and their suppliers have not been subject to, or pending, an investigation in connection with allegations involving modern slavery or human trafficking.

c) Expect organisations with whom we do business to be aware of and compliant with UK law relating to modern slavery and human trafficking.

d) Use our procurement approach with specialist advisors to ensure that potential suppliers are vetted under procurement regulations and that certain modern slavery offences under the Act are treated as grounds for the mandatory exclusion of bidders before consideration.

4.6 We will take the turnover of any subsidiaries into account when assessing whether or not a commercial organisation's turnover exceeds the £36m threshold. Where a commercial organisation is made up of subsidiaries, we will accept the Modern Slavery Statement of the parent company, provided that it covers the steps being taken to comply with the Modern Slavery Act 2015 in the relevant financial year, by both itself and the subsidiary tendering for our work.

Risk assessment and management

4.7 We will seek to maintain UK based supply chains to aid in the visibility of modern slavery prevention with UK based businesses through the requirement for commercial organisations operating in the UK with a turnover of £36m or more to publish and make available a Modern Slavery Statement (on their websites).

4.8 Our due diligence practices will help ensure that any concerns of modern slavery are identified, challenged and addressed prior to letting our properties or entering into supply arrangements.

4.9 We will act quickly and take appropriate action where it is apparent that a supplier or contractor has been associated with activities that constitute slavery or human trafficking. This may include removing them from our approved list.

Monitoring effectiveness

4.10 All Executive and Assistant Directors are required to annually complete a Modern Slavery Compliance Statement, which, following the relevant checks, provides assurance that no modern slavery concerns exist in their business area. It also requires them to identify any concerns of non-compliance, along with their plans to address them.

4.11 The Board of Saxon Weald will receive an annual report that provides assurance of our compliance with the Modern Slavery Act 2015 and identifies any changes that need to be made to this Statement or our anti-slavery practices.

5.0 Annual review of this Statement

5.1 This Statement will be reviewed and approved by the Board annually. It will be updated, as appropriate, to reflect any changes in our approach towards preventing and tackling modern slavery and provide assurance of our continued compliance with the Modern Slavery Act 2015.

5.2 This Statement has been approved by Saxon Weald's Board, for the financial year ending 31 March 2025, in accordance with section 54(1) of the Modern Slavery Act 2015.

Version	Amendment	By	Date
1.0	Annual review	AD – Business Assurance	Sept 2018
2.0	Annual review	AD – Business Assurance	Apr 2019
3.0	Annual review	AD – Business Assurance	May 2020
4.0	Annual review	AD – Business Assurance	July 2021
5.0	Annual review	AD – Business Assurance	April 2022
6.0	Annual review	ED – Resources	June 2023
7.0	Annual review	ED – Finance & Governance	June 2024
8.0	Annual review	ED – Finance & Governance	June 2025