

# Weaver Vale Housing Trust

## Modern Slavery Statement

### 2023-24

## Introduction

The Modern Slavery Act 2015 ("MSA") requires all organisations supplying goods or services with a turnover of above £36 million to prepare and publish an annual Modern Slavery Statement ("Statement"). In accordance with the MSA the Statement must set out the steps an organisation has taken, if any, during its financial year to ensure that slavery or human trafficking ("Modern Slavery") is not taking place in its organisation or supply chain.

This Statement is made pursuant to Section 54(1) of the MSA 2015 and sets out Weaver Vale Housing Trust's Statement and what the organisation has done to recognise and prevent potential incidences of Modern Slavery in the financial year 2023-24

## 1. WVHT structure, business & supply chains

Weaver Vale Housing Trust Limited ("the Trust") is an independent housing organisation (and Community Benefit Society) formed in July 2002 following a transfer of Vale Royal Borough Council housing stock. The Trust has an annual turnover of £39.321m (per 2023/24 accounts) and provides affordable homes across Cheshire and Warrington and is registered with the Regulator of Social Housing. The Trust's portfolio is diverse and has circa 6,500 homes, leasehold properties, shared ownership properties, shops, community play areas, garages and a variety of green open spaces. It has a subsidiary company of Weaver Horizons Limited with a nil turnover in 2023/24

The Trust has a diverse supply chain providing a range of goods and services including property contractors, office supplies and corporate services.

The Trust's Corporate Social Responsibility Statement states "the Trust is committed to preventing slavery and human trafficking in its activities and to ensuring that its procurement process incorporates due diligence to assess that supply chains are free from slavery and human trafficking". The Trust expects contractors, suppliers and business partners to share the same high standards regarding a zero-tolerance commitment to tackling Modern Slavery. The Trust will not knowingly trade, with, support or work with organisations involved in or associated with Modern Slavery in any way.

The Trust employs circa 300 people on a permanent and fixed term basis. There is a strict recruitment approval process in place and all new colleagues are asked to provide evidence of their right to work in the UK, in order to ensure compliance with immigration rules. The Trust contracts for services via agencies and with providers direct. The Trust works with preferred suppliers (agencies) who are required to complete relevant checks on its behalf. These checks must be obtained by the hiring Manager prior to appointment. Additional assurance is sought via Disclosure and Barring checks (DBS) where appropriate to the role. Employment references are sought for all appointments.

The Trust has a recognition agreement with two Unions – Unison and Unite.

## 2. Policies in relation to Modern Slavery

The Trust will continue to review and develop existing key policies in light of the MSA and in accordance with the Trust's Policy Framework.

The Trust is confident the following key Policies demonstrate the Trust is committed to preventing Modern Slavery in its activities, through the promotion of positive behaviour and the management and reporting of any instances which may occur.

Policies are communicated via the Trust's intranet for colleagues and those which are customer facing are communicated through the Trust's external website.

Modern Slavery is referenced in the Equality Impact Assessment, which is completed for all Policies, to ensure consideration has been given to any impacts, based on the area of work.

### **Modern Slavery Key Policies:**

**Group Code of Governance** – Standards of probity and ethical behaviour are clearly set out for Board Directors.

**Financial Regulations** – The Regulations state “The Group is committed to preventing slavery and human trafficking in its activities and to ensuring that its procurement process incorporates due diligence to assess that supply chains are free from slavery and human trafficking”.

**Colleague Code of Conduct:** Standards of ethical behaviour are clearly set out for colleagues.

**Safeguarding Children & Adults at Risk Policy** – The Policy aims to ensure the Trust complies with its legal and moral obligations to protect children and adults at risk, including abuse from Modern Slavery.

**Recruitment & Selection Policy** – The Policy and associated procedures require new employees to produce original documentation evidencing their right to work in the UK prior to commencement of employment. In addition, internal quality checks are completed.

**Domestic Abuse Policy (Colleagues)** – The Policy aims to reduce the risks related to domestic abuse and to create a safer workplace, including controlling or coercive behaviour.

**Domestic Abuse Policy (Customers)** – The Policy aims to manage reports of domestic abuse effectively and appropriately, including controlling or coercive behaviour.

**Whistleblowing Policy and Antifraud & Bribery Policy** – Confidential communication and reporting arrangements are in place to encourage colleagues to report any concerns/wrongdoings.

**Anti-Social Behaviour (ASB) Policy** – The Policy aims to prevent and respond to anti-social behaviour, including hate related ASB.

**Procurement Policy & Framework** – A Procurement Policy will be developed once new legislation has been implemented. The Policy & Framework will strengthen current processes in place.

## **3. Risk assessment, prevention and mitigation**

There have been no incidences of Modern Slavery reported to the Trust within its employment and procurement. This indicates the exposure to the risk of Modern Slavery is low. An operational risk is in place within the Finance & Business Services Directorate in relation to Modern Slavery to demonstrate that controls and mitigations are in place.

The Trust has internal audit reviews undertaken by an independent organisation which provides operational oversight. The internal audit function provides assurance as to whether there is any Modern Slavery impact or consideration, based on the area of audit. The results of all internal audits are scrutinised by the Trust’s Group Audit and Assurance Committee, with outcomes reported to the main Board.

The Trust has the following in place and is confident these can reduce the opportunities for Modern Slavery to arise and supports the ability to identify and appropriately address such instances, particularly in the Trust’s homes and the communities within which it operates:

- Safeguarding Steering Group - Risks of safeguarding are assessed through this operational group. Any concerns or incidents of safeguarding, some of which could fall under the Act, are escalated if required to the relevant statutory body or authority.
- Frameworks for Procurement and Risk & Assurance
- Policies and Procedures
- Due diligence processes
- Business operation controls
- Colleague awareness through training modules on Colleague Code of Conduct, Safeguarding and Domestic Abuse, (see also Section 6 Training)
- Multi agency forums

## 4. Due diligence processes

The Trust will continue to ensure it has due diligence processes in place across its employment and procurement processes to ensure that procedures are appropriate to the organisation's commitment to Modern Slavery.

The Trust's employment practices include:

- Requiring new employees to produce original documentation evidencing their right to work in the UK prior to commencement of employment. In addition, internal quality checks are completed.
- Recognition of trade unions and supporting their involvement in respect of employee rights.
- Compliance with both national minimum and national living wage requirements.

In line with requirements of the Crown Commercial Services and Public Contract Regulations 2015, the Trust's tender documentation includes criteria requiring potential suppliers to:

- Confirm they comply with the Modern Slavery Act 2015 (the 'Act') (if they meet the statutory thresholds) and where applicable are compliant with the annual reporting requirements contained within Section 54 of the Act. We ask for the URL link to where their Modern Slavery statement is located, so this can be verified. If they are currently non-compliant, they must set out what reasonable measures they intend to implement to achieve compliance.
- Confirm they, their organisation, subcontractors, and members of their supply chain have not been convicted of any offence involving slavery or human trafficking; if they do not provide this confirmation, we reject the tender.

The Trust will, should it be necessary, terminate contracts if a provider or subcontractor is found to have committed an offence of Modern Slavery and reserve the right to terminate contracts should they breach relevant environmental, social or labour Laws and report to the relevant statutory body.

Where possible, the Trust will tackle Modern Slavery in its communities. Any concerns will be directed to the Police for investigation where appropriate and any other relevant statutory authority.

The Trust will assess any instances of non-compliance with the Act on a case by case basis and take the appropriate action and ensure such matters are managed and recorded appropriately.

## 5. Effectiveness

- Pre-qualification criteria for suppliers will ensure effectiveness is monitored within the supply chain.
- Completion of mandatory training by colleagues.
- The Trust's internal audit function will provide assurance as to whether there is any Modern Slavery Impact or consideration, based on the area of audit.
- Internal forums - Our People Steering Group and Safeguarding Steering Group have Terms of Reference which support the Trust's commitment to tackling Modern Slavery.

## 6. Training

All colleagues receive an induction on appointment and sign up to a Code of Conduct.

The Trust records all training via its LMS365 system. Colleagues are assigned training based on their role in the organisation. Training can be classroom based or via online activities.

Training on topics such as Safeguarding and Domestic Abuse are mandatory for Line Managers. Training on the Trust's Code of Conduct is mandatory for all colleagues and refreshed every 2 years.

By the end of the financial year 2024/25 the Trust's training for colleagues will be enhanced further, and on an ongoing, cyclical basis.

## Looking to the Future & Action Plan

- A new Procurement Policy and Framework will be developed and come into effect once the Procurement Act 2023 has been implemented. The date of this legislation is unknown but anticipated to be Spring 2025. The new Policy & Framework will strengthen processes already in place.
- The training offer for all colleagues, in relation to Modern Slavery, will be strengthened by the end of the financial year 2024/25 to raise awareness and understanding of Modern Slavery risks and practices and to support colleagues in identifying and reporting concerns.

The Trust's Board, Executive and Senior Management Team will continue to take responsibility for the implementation of this Statement and its objectives, ensuring there are adequate resources in place so that Modern Slavery is not taking place within the organisation or its supply chains and addressed effectively with other agencies, when identified within communities.

The Trust will continue to work with colleagues, suppliers, partners and statutory agencies to ensure it maintains appropriate risk mitigations.

**Date Approved by Board:**

Date: 6<sup>th</sup> November 2024

**Signed By Wayne Gales – Chief Executive:**



Date: 6<sup>th</sup> November 2024

**Published on Weaver Vale Housing Trust website:**

Date: 11<sup>th</sup> November 2024

**Modern Slavery:** *“Modern Slavery” encompasses slavery, servitude, forced and compulsory labour and human trafficking. Traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude and inhumane treatment. A large number of active organised crime groups are involved in modern slavery. But it is also committed by individual opportunistic perpetrators”.*