Weaver Vale Housing Trust

Modern Slavery Act Transparency Statement

2024-2025

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 it 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 chains.

This Statement is made pursuant to Section 54(1) of the MSA 2015 and sets out Weaver Vale Housing Trust's ("the Trust") Statement and what it has done to recognise and prevent potential incidences of Modern Slavery in the financial year 2024-25. This Statement reflects the updated Home Office guidance published in March 2025 and incorporates enhanced transparency, due diligence and a victim-centred approach.

1. WVHT structure, business & supply chains

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 £42.4m (per 2024/25 accounts) and provides affordable homes across Cheshire and Warrington. It is registered with the Regulator of Social Housing with a diverse portfolio of 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 2024/25.

The Trust has a diverse UK based supply chain including contractors, cleaning and facilities suppliers, office services, building materials and development partners.

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.

The Trust employs circa 325 people on a permanent or fixed term basis. The Trust has a recognition agreement with two Unions – Unison and Unite, which the Trust works collectively and collaboratively with throughout the year, meeting both formally and informally.

2. Policies in relation to Modern Slavery

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

Modern Slavery is a consideration within the Trust's Equality Impact Assessments, Procurement Strategy and Internal Audit scope.

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.

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 and Contractor Code of Conduct: Standards of ethical behaviour are clearly set out for colleagues and contractors

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.

Bullying, Harassment & Victimisation Policy – The Policy outlines the Trust's commitment to promoting a working environment based on dignity, trust and respect and one that is free from discrimination, sexual harassment, harassment, bullying and victimisation.

Tenancy Anti-Fraud Policy – The Policy outlines interventions the Trust will take to prevent, detect and challenge fraudulent tenancy activity – this could include instances of cuckooing and trafficking within housing stock.

Procurement Policy – The policy supports how the Trust will ensure that suppliers and service providers will be managed and monitored to ensure that there is transparency within the supply chain and no breach of the Modern Slavery Act and UK Law, (see Section 7 for implementation date).

Lettings Policy – The Policy establishes clear rules, screening processes, and monitoring mechanisms that act as a frontline defence against potential incidents of Modern Slavery.

3. Risk assessment, prevention and mitigation

The Trust will be transparent about any incidents of Modern Slavery, which will be reported to the Group Audit & Assurance Committee. Any incidents will be disclosed in the Trust's annual Modern Slavery Statement and will include the number of cases reported, remediation and nature of issues.

There have been no incidences of Modern Slavery in the Trust's operations or supply chains during 2024/25. Although the absence of findings indicates the exposure to the risk of Modern Slavery is low it does not eradicate the absence of risk and the Trust acknowledges that as a Registered Provider its housing supply chains i.e. repairs, facilities, development contractors are known risk zones. An operational risk is in place within the Finance & Business Services Directorate in relation to Modern Slavery demonstrating the controls and mitigations which are in place. The risk is reviewed monthly.

The Trust undertakes supplier screening and includes contract clauses in relation to Modern Slavery (Section 4)

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 authority.

- Frameworks for Procurement and Risk & Assurance
- Policies and Procedures
- Due diligence processes
- Business operation controls
- Colleague awareness through training modules on Modern Slavery, Colleague Code of Conduct, Safeguarding and Domestic Abuse.
- Partnership with multi agency forums

4. Due diligence processes

The Trust maintains due diligence across employment and procurement processes.

The Trust's recruitment approval process includes:

- Right to Work checks to ensure compliance with immigration laws.
- Recognition of two trade unions (Unison and Unite). The Trust supports their involvement in respect of employee rights.
- Compliance with both national minimum and national living wage requirements.
- Preferred employment agencies are required to complete relevant checks on the Trust's behalf which are obtained by the hiring Manager prior to appointment.
- Disclosure Barring checks carried out.
- Employment references are sought for all appointments.

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.

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

If the Trust suspects or becomes aware of non-compliance with the Modern Slavery Act, or breaches of relevant environmental, social, or labour laws, it will respond on a case-by-case basis using a victim-centred remediation process. This may include engaging with the supplier, terminating contracts, and reporting the matter to the appropriate statutory authority.

5. Effectiveness

The Trust monitors its effectiveness through:

- Pre-qualification criteria for suppliers will ensure effectiveness is monitored within the supply chain.
- Completion of mandatory training by colleagues, which is tracked through the Trust's Learning Management System. There is a KPI target in place which monitors Mandatory Training.
- 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.
- Feedback from community stakeholders and service users will be responded to when concerns are raised.

6. Training

A Modern Slavery specific awareness training module has been introduced in 2024/25 and is mandatory for all colleagues every 2 years. Completion is tracked and recorded via the Learning Management System platform. The aim of the training is to raise awareness amongst colleagues, what to look out for, case study examples, colleagues roles and responsibilities and how to report concerns.

All colleagues receive an induction on appointment and sign up to a Code of Conduct. Training on the Trust's Code of Conduct is mandatory for all colleagues and refreshed every 2 years.

Training on topics such as Safeguarding and Domestic Abuse are mandatory for Line Managers.

7. Continuous Improvement

Since the previous statement in 2023/24 the Trust has implemented the following as part of its continuous improvement commitment to strengthen its approach to eliminating Modern Slavery in its operations and raising awareness:

- Introducing a Modern Slavery specific awareness training on the Trust's Learning Management System platform, mandatory for all colleagues.

Continuous improvement throughout 2025/26 will include:-

- A new Procurement Policy in line with the Procurement Act 2023 will be implemented during 2025/26 and will strengthen processes already in place.
- The Trust will seek to gain assurance that all existing contractors and suppliers support and comply with the Act.
- Enhancement of supply chain visibility in order to understand the profile of the Trust's direct and indirect contractors, their location and industry.

8. Governance

The Trust's Board, Executive and Senior Leadership Team are accountable for this Statement and its implementation. The Trust will continue to take responsibility for identifying, assessing and responding to any incidents of Modern Slavery. The Trust will ensure it has the necessary resources to prevent Modern Slavery within its own operations and supply chains and to work effectively with relevant agencies when such issues arise in the Trust's communities.

The Trust is committed to working collaboratively with colleagues, contractors, suppliers, partners and statutory authorities to manage risks and eliminate Modern Slavery from its activities and the communities it supports.

Date Approved by Board: Date: 29th July 2025

Signed By Wayne Gales – Chief Executive: Date: 

Published on Weaver Vale Housing Trust website: Date: 1st August 2025

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".*