

The cover features a white background with large, colorful geometric shapes: a pink triangle at the top right, a dark green triangle on the right side, a teal triangle at the bottom right, and a yellow triangle at the bottom left. The text is positioned on the left side of the page.

MODERN SLAVERY STATEMENT

The Wrekin
Housing Group

2021

1. Introduction and Structure

The Wrekin Housing Group ('the Group') is a Community Benefit Society registered with the Financial Conduct Authority under the Co-operative & Community Benefit Society Act 2014. Our main business is the provision of social housing, care and support, adding social value to the lives of the people who receive our services and live in our communities.

The Wrekin Housing Group has three subsidiaries – Choices Housing Association, a care provider; Old Park Services – a trading subsidiary; and Strata Housing Services – a development subsidiary.

The Group is regulated by the Regulator of Social Housing, with Choices Housing Association regulated by the Care Quality Commission and the Regulator of Social Housing.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. The principles and terms within this document apply to Slavery and Human Trafficking measures within The Group for the financial year starting 1 April 2020 and ending 31 March 2021. This statement covers The Wrekin Housing Group and its Group Subsidiaries as below:

- The Wrekin Housing Group is one of the largest social housing providers in the West Midlands, with over 13,000 homes for rent and shared ownership across Shropshire and Staffordshire. We provide affordable homes for single people, couples and families. Working with various community groups in these areas, we help to build and support local communities.
- Choices Housing Association is a not-for-profit supported housing and care organisation, the principal activity being the provision of housing, care and support services for older people and individuals with learning and/or other disabilities. We offer a range of housing options and support services to meet the needs of individuals who want to live independently, bringing care where it's needed to enhance quality of life and enable individuals to live the life they want, in their own home and communities.
- Through Strata Housing Services, our significant development programme provides added benefits beyond providing homes. These include job and apprenticeship opportunities, support to local businesses and economic growth.
- Old Park Services carries out trading activities and this includes maintenance, ICT, personal alarm equipment, upcycling and selling pre-used furniture and other goods through social enterprise - Reviive. Old Park Services also manages and lets market rented properties.

This statement is published on our Group Intranet and website and on The Modern Slavery Statement Registry.

2. Statement

As a business, we are committed to upholding the highest standards of probity, openness and transparency so we can provide the best service to our customers. We are committed to preventing the existence of slavery and human trafficking within our business and supply chains. We are, and will, continue to address the issue with appropriate urgency and seriousness, devoting senior management time and resources to meet our obligations and good practices.

We expect those who we work with to have the same approach and we would not work with any organisation whose approach or practices are incompatible with our own.

3. Supply Chains and due diligence

Our key area of risk lies in our relationships with supply chains – suppliers, contractors and business partners. We are committed to ensuring that our supply chains are clear to expose evidence of slavery and human trafficking. Our goods and services are from UK based suppliers although supply chains are global and we recognise that no supply chain can be entirely free from the potential of slavery or human trafficking.

We have an expectation that those in our supply chain and those who contract with us comply with our values and we rely on our ethically guided approach to procurement to determine the suitability of potential suppliers. All new and existing suppliers are being asked to provide evidence of how they mitigate the risk of modern slavery in their business and in their supply chains. They are also asked to declare that they have not been involved in modern slavery and human trafficking offences.

4. Policies and Procedures

We recognise that there is potential for our customers to be affected by modern slavery. We have policies and procedures in place which ensure that employees are vigilant to the risks for those who are vulnerable within our sector and business, for example, through the **Safeguarding Policy** and the **Homecheck Procedure**.

Through our **Social Investment Strategy**, **Procurement Strategy** and **Conduct Becoming Policy** we demonstrate our commitment to respecting human rights and operating in an ethical way with integrity. We strive to work with partner organisations to prevent and detect modern slavery.

5. Employment

We recognise that there is potential for employees to be affected by modern slavery and human trafficking.

We have robust policies and procedures in place which are regularly audited to ensure compliance with employment legislation.

We encourage employees to report any concerns relating to business activities. Our **Whistleblowing Policy** makes it easy for employees to raise concerns in confidence.

In terms of recruitment, our procedures and approach ensure that all prospective

employees are legally entitled to work in the UK and that employees are safeguarded from any abuse whilst in our employ.

Our Recruitment processes and pre-employment checks include the verification of identity and the right to work in the UK. As we work within the care sector and have close working relationships with employment agencies, we acknowledge that this is a potential area of risk and therefore have introduced service level agreements which ensure equivalent checks within the recruitment process.

6. **Training for staff**

The Executive and Senior Management Team consider where the risk of modern slavery or human trafficking may arise in their parts of the business and ensure that their teams are aware of this risk.

We have provided training to employees on Vulnerability & Exploitation and safeguarding and we are further developing our training in this area to ensure all our employees understand and are aware of the issues and risks. To help staff recognise the signs, the Modern Slavery Awareness Handbook (Home Office publication) has been published on our intranet.

7. **Future Action**

Our business is in the early stages of tackling the issue comprehensively and we will be taking further actions as part of our comprehensive approach to Equality, Diversity & Inclusion which will demonstrate a zero tolerance to Modern Slavery.

This will include steps to further expand our activities to:

- Ensure all Group staff, leaders and Board Members are trained in identifying modern slavery in our supply chains; through the use of agencies for the provisions of staff; and its potential existence within our communities.
- Provide more extensive training in this area for staff who are more directly involved in procurement or external contract management.
- Develop more robust monitoring of our contractual arrangements and procurement arrangements in this area.
- Review our Policy framework and ensure that all relevant policies are retested to ensure compliance with Modern Slavery legislation.
- Our 'See Something Say Something' Campaign will encourage all staff to 'say something' if they feel anything is wrong or have any concerns around all safeguarding issues including Modern Slavery and forms part of the ongoing safeguarding training.
- Ensure that Modern Slavery is included in the revised Equality, Diversity & Inclusion strategy being developed this financial year.

This statement is made under section 54 (1) of the Modern Slavery Act 2015 and will be reviewed and updated on an annual basis.

The Board has overall responsibility for approving this statement before publication and approved this statement on 8th November 2021.



Des Hudson Group Chair