

The cover features a white background with large, colorful geometric shapes: a pink triangle in the top right, a dark green triangle in the middle right, a teal triangle in the bottom right, and a yellow triangle in the bottom left. A vertical green line is positioned to the left of the main title.

# MODERN SLAVERY STATEMENT

2024-25

**The Wrekin**  
Housing Group

## Introduction and Organisational 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 those 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 2024 and ending 31 March 2025. 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 jobs 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 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 time and resources to meet our obligations and good practices.

We expect those we work with to have the same approach and in our selection of suppliers we work with organisation whose approach and practices are compatible with our own.

### 3. Supply Chains and Due Diligence

One key area of risk lies in our relationships with supply chains – suppliers, contractors, developers and business partners.

We are committed to ensuring that all of our supply – chains, from the development of new homes, the repairs and maintenance of our existing stock; business support and professional services are transparent and uncomplicated to prevent and expose evidence of, slavery and human trafficking.

We will seek, through our procurement processes, with ongoing checks via our contract management procedures to ensure achievement of our policy.

The goods and services we acquire are almost exclusively sourced from UK based suppliers although some supply chains are global. We recognise that no supply chain can be entirely free from the risk of slavery or human trafficking and pro-active action is part of our probity as a business.

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 and contractors are required to provide evidence of how they mitigate the risk of modern slavery in their business and in their supply chains and sub-contractors. They are also required to declare that they have not been involved in any modern slavery and human trafficking offences. We recognise that the current global context means increased fluidity in supply chains and will maintain diligence in our approach. We share with our suppliers our expectation that they are doing the same.

### 4. Customers

We recognise that with over 20,000 people living in our homes 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 Policy**. Our **'See Something, Say Something'** campaign continues to remind all staff to be aware of the signs of abuse such as modern slavery or domestic violence. Our cross organisation, all staff Equality Diversity and Inclusion (EDI) awareness training also incorporates modern slavery, the signs to look out for and the importance of remaining vigilant.

Through our **Social Value Strategy, Procurement Strategy, EDI Strategy and Code of Conduct Policy** we demonstrate our commitment to respecting human rights and operating in an ethical way with integrity.

We recognise that partnership working is an integral part of our approach and we will continue to build on existing links and create new ones to prevent and detect modern slavery. We are committed to a sensitive approach and will look to use lived experience stories to remind staff, partners and contractors of why diligence is so important and the impact it can have.

Our 'Getting to Know You' initiative incorporates visits to customers who we hear from less frequently and gives us further opportunities to enhance our diligence. In 2024/25, we will be introducing more locally based working. Area teams will work together more closely, creating more opportunities to share information, such as signs of modern slavery and to act upon these. This refreshed approach will be combined with further data insights to identify where customers may show signs that something more is happening in their lives, related to their welfare, including any potential for 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 **Whistle-blowing Policy** and **Safeguarding Policy** make it easy for employees to raise concerns in confidence and ensures employees are safeguarded from any abuse whilst in our employment.

In terms of recruitment our procedures and approach ensure that all prospective employees are legally entitled to work in the UK. Our recruitment processes and employment checks include the verification of identity and right to work in the UK, appropriate level DBS checks and qualification and reference checks covering at least two years of employment history.

We acknowledge the use of recruitment agencies is a potential area of risk and therefore have introduced service level agreements which ensure equivalent checks within the recruitment process. Our main agency suppliers are also verified members of the Procurement for Housing Recruitment Framework.

## 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 continue to develop our training and awareness raising in this area to ensure all our employees understand and are aware of the issues and risks.

We have an EDI Steering Group, led by the Executive Director of Business Solutions, which monitors and tracks progress on staff training plans and our EDI learning interventions include raising awareness to Modern Slavery, what to look out for and what to do if any concerns are raised. We also continue to provide staff safeguarding training which helps colleagues identify any issues or concerns when working with customers in their homes.

To help staff recognise the signs the Modern Slavery Awareness Handbook (Home Office publication) has been published on our intranet. In 2024/25, we will talk with staff about how we can make this information even more accessible through our Workplace pages and other communication channels.

## 7. Future Action

Our business is continuously reviewing its approach to comprehensively tackling the issue of modern slavery. We have adopted the Good Economy Environmental Social Governance (ESG) reporting framework with a strong focus on ethical business. We also have a well embedded Equality, Diversity & Inclusion Strategy which reinforces our zero tolerance to Modern Slavery.

### **Key achievements in 2023/24 have been:**

- EDI training, new staff induction and See Something, Say Something awareness raising all include being aware of the signs of modern slavery
- Getting to know you visits have been made to customers that we hear from the least
- Strengthening checks through our procurement framework
- Modern slavery included in 2025 Internal Audit
- Workshops with staff to talk about EDI further

### **Our priorities for the next 12 months include:**

- Promote our zero tolerance to modern slavery and provide refresher training through our virtual bitesize managers sessions
- Expand our modern slavery training for staff who have specific responsibility for procurement and contract management
- Monitor completion of mandatory recruitment training for all hiring managers
- Explore the implementation of digital ID checks in our recruitment process, providing further assurance on right to work verification
- Further develop our partnership approach to deter and identify modern slavery and to implement a joined-up response where this may happen.
- Continue to improve the monitoring of our contractual and procurement arrangements with regards to modern slavery, including implementing a Modern Slavery Supply Chain Audit Toolkit.
- Use our Equality Impact Assessments as a further chance to consider modern slavery prevention and action to address if identified

- Through our more localised working, include See Something, Say Something conversations to ensure staff are looking for the signs of modern slavery
- Use data insight to identify where customer behaviour may suggest a welfare concern, including modern slavery.
- Sensitively capture and share any lived experience stories to show the impact modern slavery can have and why prevention and robust action are so important.
- Include our Modern Slavery Statement within our Internal Audit programme for 2025.

**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 25 September 2024.

A handwritten signature in blue ink, appearing to read 'Des Hudson', written over a light blue horizontal line.

**Des Hudson,  
Group Chair**