

WM Housing Group (“the Group”)

Slavery and Human Trafficking Statement

1 Introduction from Kevin Rodgers, Group Chief Executive

We are proud of the steps we have taken to combat slavery and human trafficking and are committed to improving our practices in this area.

The Group has recognised its obligations in identifying, targeting and preventing slavery and human trafficking and we understand that everyone has a role to play to eliminate this.

We have outlined below the steps that we have taken to target this and as a group organisation we are always keen to examine the effectiveness of our approach so that we can continue our good practice over the course of the year.

2 Organisation's structure

WM Housing Group heads a group of entities undertaking a range of community and social based activities, including housing, regeneration, community development and care. We employ almost 1,000 members of staff and manage more than 30,000 homes across Herefordshire, Worcestershire, Birmingham, Coventry and the wider West Midlands.

Our global annual turnover is over £36m.

More information about who we are, our vision and values as well as our Board and Executive Management Team can be found by clicking [here](#).

3 Our supply chains

As a group of registered providers we do not operate extensive, worldwide supply chains. Due to this, we are able to build close relationships with suppliers which enable us to promote our commitment with regards to slavery and human trafficking.

4 Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery in our supply chains or in any part of our organisation. As part of this, we have introduced an Anti-Slavery Policy which reflects our commitment to acting ethically and with integrity in all our business relationships, as well as implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our Anti-Slavery Policy is available to all our staff and we inform our suppliers of our commitment to preventing modern slavery. A copy of the policy can be found [here](#).

5 **Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk we have in place systems to:

- identify and assess potential risk areas in our supply chains;
- mitigate the risk of slavery and human trafficking occurring in our supply chains;
- monitor potential risk areas in our supply chains; and
- protect whistle blowers.

6 **Our risks and how we manage this**

As we are based in and operate solely within the UK, we have identified that as an organisation our exposure to the risk of slavery and human trafficking is low. However, as part of our ongoing process to identify and monitor risks we have identified that our key area of risk lies in our relationships with supply chains and contractors. To manage this risk, we require third parties to acknowledge our commitment to combat slavery and human trafficking by inserting relevant clauses into our agreements.

7 **Supplier adherence to our values**

As an organisation we have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, we have in place a supply chain compliance programme. This consists of incorporating a standard clause into all of our new agreements with suppliers and contractors which informs them of our commitment to combatting slavery and human trafficking and requires them to agree to this commitment when working with us.

We are committed as a group to tackling modern slavery and human trafficking and want to work with suppliers who share this commitment.

8 **Our effectiveness in combating slavery and human trafficking**

We use the following key performance indicators (KPIs) to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our organisation or supply chains:

- recording and monitoring any incidents or reports made to us by staff in accordance with our Anti-Slavery Policy using the mechanisms established in our Confidential Reporting Policy;
- monitoring any incidents or allegations across our supply chains which conflict with our values; and
- recording any incidents or complaints received from any third parties concerning slavery and human trafficking.

9 **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our organisation and our supply chains, we intend to develop a training and information campaign to help staff to better understand the risks and how we as an organisation are working to manage this.

All our staff have been provided with a copy of our Anti-Slavery Policy which encourages individuals to monitor and report anything untoward.

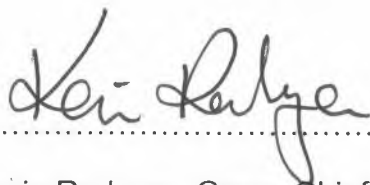
We also encourage our business partners to provide training to their staff and suppliers.

10 **Further steps**

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- continuous monitoring of our business and its supply chains to ensure we are free from slavery and human trafficking;
- continuing to require our contractors and supply chains to act in accordance with our Anti-Slavery policy when dealing with us; and
- ongoing education and promotion of our Anti-Slavery Policy along with a training program to ensure our staff understand and adopt our values.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2016.



Kevin Rodgers, Group Chief Executive

WM Housing Group Limited

Date: 21.03.2016

