

WM Housing Group Slavery and Human Trafficking Statement

Annual Update 1st April 2017- 31st March 2018

1 Introduction from Kevin Rodgers, Group Chief Executive

This is our third annual statement and WM Housing remains proud of the steps we have taken to combat slavery and human trafficking and remain committed to improving our practices in this area. I can confirm that we have received no reports of slavery or human trafficking in our business or with any of our wider supply chain partners.

WM Housing Group remains committed to our zero tolerance approach to slavery and human trafficking and the work we, our partners and supply chains do. We recognise our obligations to identifying, targeting and preventing slavery and human trafficking and we understand that everyone has a role to play to eliminate this.

The government issued revised guidance in October 2017 to those companies required to produce a statement. WM Housing had already included the information suggested within this guidance in our previous statements including information on the organisation's structure, policies and due diligence processes and ensuring the named person signing the statement also sits on the board that approves it. We therefore do not need to make any significant changes to our statement as a result of this issued guidance.

In regards to our approach to tackling slavery and human trafficking; we continue to ensure we have up to date policies that our staff have an understanding and receive training on modern slavery and that due diligence remains in place particularly for our supply chains and relationships with contractors. It is for these reasons and the assurances received that our working practices are adequate that our statement remains similar to those issued in previous years.

Our previous two statements will remain available to view on our website.

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 over 1,000 members of staff

and manage more than 30,000 homes across Birmingham, Coventry, Herefordshire, Worcestershire and the wider West Midlands.

We are a not for profit social housing business creating places where people are proud to live and work. We do however have Signature Homes, who develop open market housing to subsidise the development of more affordable homes.

Our global annual turnover is over £36m.

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 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. This policy was introduced in March 2016 and is due for review in March 2019. A copy of the policy can be found [here](#).

We also have a robust safeguarding policy and procedure in place and regular role specific safeguarding training for our staff. This helps all staff to identify any safeguarding issues within our homes and ensure they follow the correct referral procedures; the procedure is regularly reviewed to ensure its effectiveness.

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 via our confidential reporting policy.

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 a zero tolerance approach to slavery and human trafficking. To ensure all those in our supply chain and any 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 indicators 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 and Safeguarding Procedure;
- 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 and awareness**

We understand that training is fundamental in our duty to ensure that there is no slavery or human trafficking in our business or supply chains. We

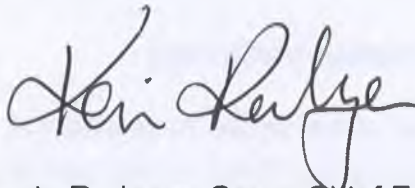
continue to train and raise awareness amongst staff to help them better understand modern slavery and human trafficking as well as the risks associated with it and how as an organisation we are working to manage this.

10 Further steps - 2018/19

We are committed to ensuring that our business and supply chains remain slavery and human trafficking free. During the year we will continue to ensure;

- there is continuous monitoring of our business and its supply chains to ensure we are free from slavery and human trafficking;
- our contractors and supply chains act in accordance with our Anti-Slavery policy when dealing with us; and
- there is an ongoing awareness of our Anti-Slavery Policy alongside a training programme 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 2018.



Kevin Rodgers, Group Chief Executive

WM Housing Group Limited

Date: 26/03/18

