

MODERN SLAVERY STATEMENT

2022

The Wrekin
Housing Group

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 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 2021 and ending 31 March 2022. 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 business 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 senior management time and resources to meet our obligations and good practices.

We expect those 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, and prevent, slavery and human trafficking. Our goods and services are from UK based suppliers although supply chains are global. We recognise that no supply chain can be entirely free from the potential 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 are 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 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.

4. Customers

We recognise that with over 20,000 customers living in our homes 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 Policy**. Our 'See Something, Say Something' campaign in 2021 reminded all staff to be aware of signs of domestic abuses or modern slavery, for example. Our cross - Group EDI training – commencing in September 2022 will further remind staff of the importance of remaining vigilant.

Through our **Social Value Strategy**, **Procurement Strategy**, **EDI 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.

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. We are committed to approaching it sensitively but 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 'Behind Closed Doors' initiative to visit customers who we hear from less frequently in 2022 will give us further opportunities to enhance our diligence. Building on this in 2022-23 we will also use further insights through data to identify where customers may show signs that something more is happening in their lives related to their welfare, including 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** 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 employment.

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

Our staff EDI training includes raising awareness to Modern Slavery, what to look out for and what to do if any concerns are raised. We brought this to life through our 'See Something, Say Something' campaign and will build upon this in 2022/23 through our Diversity day, lunch and learn sessions and training.

To help staff recognise the signs the Modern Slavery Awareness Handbook (Home Office publication) has been published on our intranet. In 2022/23 we will talk with staff about how we can make this information even more accessible and impactful.

7. Future Action

Our business is developing its approach to tackling the issue comprehensively. We have adopted the Good Economy Environmental Social Governance (ESG) reporting framework with a strong focus on ethical business. We have also recently adopted a new Equality, Diversity & Inclusion Strategy which again demonstrates our zero tolerance to Modern Slavery.

Our priorities for the next 12 months will further expand our activities to:

- Use our business wide EDI training to further promote the signs of concerns. Through this we will ensure staff are clear on the importance of this, how to report concerns and the impact this could have for people.
- Develop our partnership approach further to focus on pro-active work to deter modern slavery but also a joined-up response where this may happen.

- Use data to identify where customer behaviour may suggest there may be a welfare concern, such as Modern Slavery.
- Increase the use, sensitively, of lived experience stories to show the impact Modern Slavery can have and why prevention and robust action are so integral.
- continue to improve the monitoring of our contractual and procurement arrangements with regard modern slavery

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 28th September 2022.

A handwritten signature in black ink, appearing to read 'Des Hudson', is centered on the page. The signature is fluid and cursive, with a long horizontal stroke at the end.

Des Hudson Group Chair