

**Modern Slavery and Human Trafficking Statement 2023**

**Background**

It is the duty of any incorporated organisation or charity with a turnover of £36m or more to produce a statement setting out their approach to the crime of slavery and human trafficking.

Whilst WFHA does not have a legal duty to do this, it is important that the organisation does what it can to prevent the exploitation of people.

WFHA takes steps to tackle modern slavery and human trafficking both in our supply chains, and in the services we provide to people. We are committed to improving our practices and procedures continually.

WFHA takes a zero tolerance approach to slavery and human trafficking and expects all those in its supply chain including contractors to comply with its values.

**Our Business and Organisational Structure**

WFHA is a provider of social housing that started in the 1960’s. WFHA is an independent organisation and has grown into a diverse provider of accommodation and half of its stock is sheltered housing for older people.

WFHA currently operates solely within the London Borough of Waltham Forest and has three main business areas of operation: general needs accommodation, housing for older people, and supported housing with services provided by partner agencies to tenants living with learning disabilities.

**Responsibilities**

WFHA is continually working to identify how modern slavery and human trafficking may affect our tenants and housing applicants. We come across a wide range of people who reflect diverse backgrounds and needs.

WFHA recognises that, whilst more isolated tenants and people with learning difficulties may be particularly vulnerable or at risk, anyone can be caught up in slavery or trafficking.

WFHA has a framework of policies, procedures and contractual requirements to help prevent slavery or human trafficking within our organisation and supply chains.

All policies are reviewed by the Executive or Senior Management team and key policies are approved by the Board on a rolling basis. WFHA updates policies and procedures in response to audit, statutory or regulatory changes as well as operational experience of staff and tenants.

WFHA wants to get better at identifying when people are being exploited in this way. To this end, staff are trained on a rolling basis about signs that someone might need help and are aware of how to escalate their concerns.

**Procurement and Supply Chain**

WFHA is committed to ensuring that there is no modern slavery or human trafficking in its supply chains.  We manage projects and procurements where services and products are sourced from suppliers. Some of these services are not procured by us directly but are sourced from a procurement framework. WFHA work closely with our procurement agent, the South East Consortium, and our contractors.

As an organisation that does not wish to work with any business knowingly involved in slavery or human trafficking in any part of its operations, WFHA take the following steps:

* Require suppliers to declare that they are not involved in slavery or human trafficking and have not been subject to any investigation in connection with any offence involving slavery or human trafficking
* Incorporate provisions in our contract and sub-contract documentation requiring our suppliers to take appropriate steps to ensure that there is no slavery or human trafficking in their supply chains
* Include within tender documentation instructions that we expect suppliers to comply with the Modern Slavery Act 2015
* Require suppliers to complete and sign the WFHA Contractors Code of Conduct agreement stipulating that they comply with the Modern Slavery Act.
* Work collaboratively with suppliers identifying those procured goods/services which may carry the highest risk of modern slavery within their supply chain and requiring our suppliers/contractors to confirm the steps taken to ensure there is no slavery or human trafficking in their supply chains
* Publish a whistleblowing policy for all staff.
* Provide training for staff in safeguarding, domestic abuse and violence services, including identifying potential cases of modern slavery and human trafficking and how to report them.
* Observe a robust procurement process meaning WFHA only engages with reputable suppliers and contractors who adhere to the law, other regulation and best practice.

**Recruitment**

WFHA has clear recruitment procedures including Right to Work checks for all permanent and interim employees. We ensure that where agency workers are used, these are only sourced from reputable employment agencies.

Using this approach, we seek to avoid inadvertently engaging those who present as looking for work for themselves, but who are actually ‘controlled’ by others.

All new WFHA employees receive induction training on equality and diversity which seeks to recognise and work with vulnerable people and children in our communities.

All employees are subject to regular Disclosure and Barring Service checks before they start working alone with tenants and WFHA adheres to a detailed policy on previous convictions.

**Code of Conduct**

All managers and employees are required to adhere to a Code of Conduct which clearly sets out expected standards of behaviour. The Code requires employees to act with honesty, integrity, report misconduct and take responsibility for safeguarding.

**Safeguarding**

All employees are expected as a minimum to complete our mandatory e-learning module within the required timeframe.

**Investigations**

Members of the Executive and Senior Management Teams are responsible for investigations and are accountable for known or suspected instances of slavery or human trafficking.

**Future Action**

WFHA will

* continue to take action to improve its approach to modern slavery to mitigate risk.
* continue to raise awareness and deliver training to new and existing employees.
* maintain close relationships with its partners to combat slavery and human trafficking.

This document will be reviewed every three years.

Last reviewed: Approved by Board March 2023

Next review: March 2026