

## **Slavery and Human Trafficking Statement**

### **1 Introduction from the Tracey Lees, Chief Executive**

Wandle and its subsidiaries will not tolerate slavery or human trafficking in any of its forms, in any aspect of our business.

This statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. We hold ourselves and our supply chain accountable for this.

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 March 2019.

### **2 Organisational structure**

Wandle is a housing association, incorporated as a charitable Registered Society.

It is also the parent company of three subsidiaries, which are limited companies. These are:

- a. Delta Homes Limited, a wholly owned subsidiary which provides a building and property development service.
- b. Ravensbourne Developments Limited, a wholly owned subsidiary which is a property development company focused on building and selling outright sale homes.
- c. Unitworthy Property Management Limited, which holds the head lease and provides management services for one block of properties and is majority owned by Wandle.

The wholly owned subsidiaries gift-aid any profit made to Wandle Housing Association.

The Wandle group has approximately 180 employees and currently all its operations are based in London.

The Group's annual turnover is projected to be £67m for 2018/19.

### 3 Our approach to modern slavery and human trafficking

As part of our initiative to identify and mitigate risk we work to:

- Identify and monitor potential risk areas in our business, supply chains and properties;
- Mitigate the risk of slavery and human trafficking occurring;
- Protect whistle blowers. We have an up-to-date whistleblowing policy and procedure.

We have reviewed our business and consider our highest risk areas to be:

- Supply chain – in particular construction, cleaning and estate services contracts (directly employed labour and through sub-contractors)
- Use of Wandle properties for slavery or human trafficking

All new suppliers and contractors are required to sign contracts which include an obligation to comply with all legislation. In addition the requirement to provide warranties on modern slavery throughout supply chains is built in to the procurement process together with a condition that relevant bidders must provide a copy of their modern slavery statement. This applies to all contracts overseen by our procurement team. In addition, existing high risk suppliers have signed a separate warranty on modern slavery.

During the last year we have worked with our Managed Service Provider (Mears) to embed the new contract for our Direct Labour Organisation. This has helped provide stability in our supply chain and reduced the number of small contracts we are dealing with. In addition we have continued to move away from individual small orders in other areas of the business and moved to larger, longer term contracts in areas including Estate Services, Mechanical and Engineering Services and Print Services. This provides greater stability and certainty for us and our suppliers and contractors. Given the high risk associated with the Estate Services contract we additionally required suppliers tendering for this to commit to paying London Living Wage as a minimum.

We are working on improving our invoice payment times to ensure that late payments do not put pressure on our supply chains which may result in them being unable to pay their workforce or in them cutting corners in relation to slavery prevention. This is an area that needs further improvement and will continue to be an objective for next year.

With regards our workforce, all Wandle employees are paid at least the London Living Wage. We check identification and ensure all employees have the right to work in the UK. We also conduct DBS checks for all employees working with vulnerable people. These requirements are passed on to any employment

agencies used by Wandle. Additionally salaries will only be paid into bank accounts which are in the employee's name. We also provide an Employee Assistance service whereby employees can confidentially discuss any issues they are experiencing and this includes modern slavery.

We have safeguarding policies in place and in 2018/19 all employees were required to undertake online safeguarding training. We also provided additional face to face training for frontline employees. The policy and training helps Wandle employees to spot modern slavery and provides guidance on what to do if they suspect this may be occurring. We did not have any reports of modern slavery during the year.

#### **4. Further steps**

We recognise that there is always more that we can do to prevent and detect modern slavery and human trafficking. Over the coming year we will:

- Look at ways to extend the requirement to pay the London Living Wage as a minimum to all suppliers and contractors in our supply chain.
- Review and update our whistle blowing policy
- Continue to work on improving our invoice payment times
- Introduce a new programme of tenancy audits
- Provide communications to our residents on modern slavery giving them information on the issue and signposting where to get help if they are the victim of this, or suspect that someone else is.



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