

## **Slavery and Human Trafficking Statement**

### **1 Introduction from the Tracey Lees, CEO, Wandle**

Wandle and its subsidiaries will not tolerate slavery or human trafficking in any of its forms, in any aspect of our business. We hold ourselves and our supply chain accountable. All our new contracts have clauses which set out our expectations on modern slavery and which require our suppliers to warrant that they comply with the Act and pass this requirement down through their own supply chains.

We recognise that modern slavery is a complex supply chain issue. During 2017/18, we reviewed our supply chain and identified the high risk suppliers who we have not previously required to provide Modern Slavery warranties. We have worked with them to address this important issue and 90% have now provided warranties. We are working to obtain the outstanding warranties from 4 suppliers.

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 2018.

### **2 Organisation's 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, which provides a building and property development service.
- b. Ravensbourne Developments Limited, which is focused on building and selling of outright sale homes.
- c. Unitworthy Property Management Limited, which provides the maintenance service for one block of properties.

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

The Wandle group has approximately 200 employees and currently all its operations are based in London.

The Group's annual turnover is projected to be £49m for 2017/18.

### 3 **Our supply chains**

Where Wandle is directly providing services, it complies with UK employment legislation. In other cases, it works with supply chains. These include:

- Recruitment agencies
- Consultants, contractors and sub-contractors
- Suppliers/providers of materials and equipment for the development, maintenance and repair of Wandle homes
- Professional and financial service providers and delivery partners

We expect all these organisations to ensure that their goods, materials and labour-related supply chains comply with the Modern Slavery Act 2015 and have clauses in all our new contracts to require this.

During the year we have worked to ensure that Wandle moves away from multiple individual short orders for repairs with a variety of small contractors with no security of work. We have consolidated our small repairs contracts as part of our contract with our Managed Service Provider (Mears), who now manage our Direct Labour Organisation (DLO) and all sub-contractors. In addition Mears themselves recently won a long term contract from Wandle (up to 8 years), having previously operated on an emergency short term 2 year contract. This has brought additional stability to our supply chain.

We have additionally taken steps to reduce our payment times to suppliers and have achieved a 23% improvement over the last 12 months. We are now paying 63% of suppliers on time and recognise that this is an area for further improvement over the next year.

### 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. We already take action to ensure that we are compliant with employment law, and most of our contractors and suppliers are in the UK, and so are also required to follow UK employment law.

We realise however, that there may be more that we can do and therefore maintain an ongoing review of best practice to ensure that our policies and processes are updated, with this in mind.

This 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.

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

As part of our initiative to identify and mitigate risk we work 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 whistleblowers. We have an up-to-date whistleblowing policy and procedure.

## **6. Further steps**

In addition to ensuring that all outstanding warranties are received, we are working to further reduce payment times to suppliers in line with our corporate plan targets.



Date: 31/03/2018