

Modern slavery and human trafficking statement

2023/24

Introduction

West Kent Housing Association (West Kent) is fully committed to preventing modern slavery within our organisation and throughout our supply chains.

As a relevant commercial organisation as defined by section 54 of the Modern Slavery Act, we seek to ensure there is transparency in our practices and supply chains, consistent with our disclosure obligations.

We are committed to acting ethically, implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

We are committed to continually raising our standards and practices in assessing and monitoring those that work with us and for us. We expect the same high standards from all our staff, contractors, suppliers and business partners in any capacity.

This statement sets out the steps we have taken, and actions we intend to take, to minimise the risk of modern slavery in connection with our operations in the financial year ended 31 March 2024.

Organisational structure and business function

West Kent consists of West Kent Housing Association, West Kent Extra Limited and West Kent Ventures Limited. West Kent also has a joint venture subsidiary, INK Development Company Limited. West Kent's charitable subsidiary, West Kent Extra Limited, will be liquidated in 2024/25 and its business activities transferred to West Kent Housing Association. A decision has been made by the board of joint venture, Ink Development Company Limited to dissolve that entity in due course.

West Kent Housing Association is registered with the Financial Conduct Authority under the Co-operative and Community Benefit Societies Act 2014 and is registered with the Regulator for Social Housing as a social housing provider. As a Registered Social Landlord, West Kent Housing Association is a contracting authority and subject to the Public Contract Regulations 2015.

West Kent Extra Limited is a registered charity providing community support services.

West Kent Ventures Limited is a wholly owned commercial subsidiary which is currently dormant.

INK Development Company Limited is a joint venture 50:50 ownership between WKHA and Southern Housing.

West Kent owns and manages over 8,500 properties and employs approximately 360 staff. Our main function is to supply housing to people with a housing need, with the objective of being the leading community provider of affordable homes in Kent.

The information provided below describes the systems and controls which have

been in place in the last year to minimise modern slavery and human trafficking from occurring in our operations, supply chains and communities.

Areas of risk

West Kent operates exclusively within the South East of the United Kingdom. We have deemed the risk of modern slavery occurring within our organisation and supply chains as relatively low. However, we have identified the biggest areas of risk to be:

- contracted (and subcontracted) labour in relation to construction and property maintenance; and
- our assets, specifically the homes we provide, being used to facilitate human trafficking and modern slavery.

We have in place systems to:

- identify and assess potential risk areas in our business operations and supply chains;
- mitigate the risk of slavery and human trafficking occurring in our homes and supply chains;
- monitor potential risk areas in our business operations and supply chains;
- Enable reporting of suspected modern slavery and protect whistleblowers.

Procurement and supply

West Kent will never knowingly deal with any business involved in slavery or human trafficking and has the following measures in place to mitigate against it.

We have reviewed our standard contract terms to ensure that potential future suppliers are aware of West Kent's position on slavery. We have reviewed our forms of contract to ensure they set out our expectation that suppliers will be compliant with the requirements of the Modern Slavery Act (2015) and mechanisms are in place to terminate contracts where involvement in slavery has been discovered. Where we identified any non-compliance with the Modern Slavery Act (2015), we would use these clauses to terminate the contract. We have not had to take this action during the year.

We have updated our due diligence checks to help us identify any potential future supplier whose activities may be considered to be at a high risk of involvement in slavery. This includes a series of questions, asked early in a tender process for contracts valued over £5,000 plus VAT, which require new suppliers to make a declaration regarding their own policies and procedures as well as on behalf of their supply chain where applicable. Suppliers whose turnover is below the threshold for reporting are required to note and adhere to behaviours and reporting requirements set out in West Kent's own factsheet. We would not take forward a contract with a potential supplier who did not meet our modern slavery requirements during the due diligence process.

We almost exclusively source goods and services from suppliers with short supply chains and operating within the UK. Exceptions apply around Software as Service contracts delivered from outside the UK are procured in accordance with Public Contracts Regulations 2015 (as amended).

Looking ahead, we will be implementing annual contract audit checks for those long term (over 12 months) supplier contracts we consider to have an overall risk rating of medium and higher.

Employment

West Kent has robust procedures in place for vetting new employees and confirming their identities. We ensure that all staff are eligible to work in the UK and only pay salaries directly into employees' personal bank accounts. All staff are paid at least the Real Living Wage. We have sufficient processes in place to ensure that we comply with UK employment law.

We will only work with employment agencies that are compliant with the Modern Slavery Act 2015 and this statement.

Homes

We have identified the use of our properties to facilitate modern slavery as a risk. To use a West Kent property for any criminal, immoral, anti-social or illegal purpose is a breach of tenancy and one which we will enforce to ensure that our homes are not being used to facilitate modern slavery. We work in partnership with a number of organisations to share intelligence to increase our ability to identify where modern slavery may be taking place.

We have sufficient procedures in place to ensure the appropriate allocation of our homes, and carry out checks to confirm identities. Where a tenancy has been granted subsequent to a fraudulent application, we have appropriate mechanisms to end the tenancy.

Staff training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our businesses, we provide training to our staff on the risks of modern slavery and how to address them.

We have an e-learning module on identifying and reporting modern slavery. We have introduced an enhanced requirement for all existing staff to complete this training during 2024/25 and for all new staff to complete it as part of their induction. The Risk and Governance function has reported on modern slavery training completion to the Board and this will be introduced as a standard KPI in 2024/25.

Staff are also encouraged to undertake safeguarding training to identify when someone they come into contact with needs help. For staff whose work predominantly involves direct contact with residents, safeguarding training is mandatory.

Working practice

We have existing policies which contribute to preventing human trafficking and modern slavery. These include:

- Adult Safeguarding Policy
- Safeguarding Children Policy
- Recruitment Policy
- Whistleblowing Policy
- Procurement Policy and Procedures
- Fraud Policy
- Anti-money laundering policy

Governance

We have a dedicated compliance team, which consists of the Head of Risk and Governance, supported as necessary by the Procurement Function, HR and representatives from the Housing and Property Services Departments.

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 2023

It was approved by our Board and will be reviewed at least annually.

Signed

Piers White
Chair of the Board of Management

3 April 2024