**WARRINGTON HOUSING ASSOCIATION**

**MODERN SLAVERY AND HUMAN TRAFFICKING: OUR STATEMENT**

Warrington Housing Association (WHA) is committed to improving our practices to combat slavery and human trafficking. We have a zero-tolerance approach to corruption, bribery and modern slavery.

This Statement reflects our commitment to act ethically, with integrity and to comply with the principles of the Modern Slavery Act 2015.

**OUR STRUCTURE AND PURPOSE**

WHA was established in 1975 and currently manages approximately 1,300 properties in the Warrington area. The Association is a registered society under the Co-operative and Community Benefit Societies Act 2014 with tax-exempt, charitable status. WHA uses it assets to reinvest in the local community supporting our aim of helping make Warrington a great place to live in the town.

**OUR SUPPLY CHAINS**

Our procurement activities take place in England and our contractors and suppliers are predominantly UK based. We expect our contractors and suppliers to share our values on modern slavery and also carry out their own due diligence on their own supply chains to limit the risk of modern slavery taking place.

**OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We have a number of policies and procedures in place that contribute to ensuring modern slavery does not occur in our business or supply chain which include our:

Procurement Policy

Safeguarding Policy

Recruitment and Selection Policy

Making a Protected Disclosure Policy

Equality and Diversity Policy

**DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk we have agreed management responsibility of this statement. We have raised awareness of this Policy by circulating to all staff and also our suppliers and contractors.

**SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

We have a zero-tolerance approach to slavery and human trafficking. We have shared our policy with our contractors and suppliers and ask that they abide by the principles of the Modern Slavery Act 2015 and commit to ensuring that modern slavery is not taking place in their own supply chains. We also propose to incorporate new contractual clauses within our contractors and suppliers which will ensure that they comply with the Modern Slavery Act 2015 and will also allow us to terminate the contract if there is a modern slavery or human trafficking breach by a supplier.

**ON-GOING COMMITMENT TO THE MODERN SLAVERY ACT 2015**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our commitment is to act ethically and with integrity in all our business relationships and to implement effective systems and controls to ensure slavery and human trafficking is not taking place. We are further committed to making sure that our properties are not used to accommodate the work of human traffickers or detain others for servitude.

**MONITORING EFFECTIVENESS**

The pre-qualification criteria for supplies will have a requirement to have measures in place to minimise the possibility of modern slavery in their business and supply chain.

**TRAINING**

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