

Wates and Unseen: navigating a complex sector together

**Understanding risks, strengthening
processes, and prioritising person-
centred thinking**

Before partnering with Unseen, Wates already had a strong baseline understanding of modern slavery risks within construction, supported by their modern slavery statement, internal policies, and training programmes. They had established governance structures, including a modern slavery working group that met regularly, and had delivered mandatory awareness training for employees and relevant partners.

Wates recognised, however, that construction is a sector with complex challenges, including opaque supply chains, sub-contractor layering of work and material contracts, high use of temporary labour, and a diverse and ever-changing workforce with hundreds or even thousands of people involved over the lifecycle of one project.

“As a result, we understood that managing the risk of exploitation requires ongoing specialist expertise. Whilst we had foundational controls in place, we saw the need to deepen our understanding of emerging risks, strengthen our processes and ensure our approach reflected best practice and person-centred thinking.”

- Laura Roberts, Head of Ethics and Compliance

Wates first recognised they would benefit from external support in 2024 as they reflected on aims and goals for the future following on from the publication of their modern slavery statement. They recognised they had good foundational principles in place, but wanted to move beyond compliance and embed an approach that put people front and centre. This coincided with the launch of Wates' purpose 'Reimagining places for people to thrive'.



"We wanted our modern slavery programme to demonstrate our commitment to this purpose. Working with Unseen allowed us to ensure our policies, procedures and training kept pace with evolving risks, and to strengthen our ability to identify, respond to and prevent exploitation."

By the end of 2024, Wates had entered into their first year of partnership with Unseen.

"Unseen was already known to us as a leading charity with deep expertise in supporting victims and tackling exploitation at a systemic level. Its combination of frontline knowledge, policy insight and business engagement made it a strong fit for the direction we wanted to take."

Wates were particularly attracted to Unseen's practical, partnership-based approach and experience working with sectors that face similar challenges. Unseen's emphasis on creating safe, transparent, and ethical supply chains aligned closely with Wates' aims and values, making the partnership a natural choice.

The initial focus areas for Wates were:

1. To review and enhance their modern slavery statement
2. To carry out a full review of their current modern slavery framework, looking at governance and reviewing policies and procedures to see where opportunities to strengthen their existing approach arose
3. To conduct a programme of site-level worker wellbeing visits
4. To create a stronger escalation and response framework so teams know how to act quickly and appropriately

Wates also wanted to improve their approach to understanding the risks within their supply chain and to better engage with these organisations on the topic of modern slavery.

The partnership began with initial conversations between Wates' Ethics and Compliance team and their Unseen account manager. These early conversations focused on understanding Wates' existing maturity, clarifying objectives, and identifying opportunities for improvement.

The first step in their journey was for Unseen to carry out a primary gap analysis through a thorough desk-top assessment of Wates' modern slavery approach and strategy.



Findings and recommendations were made for each element of the analysis and Wates worked with Unseen to look at implementation strategies and timelines.

Wates' primary goal was to gather more information from their sites by conducting worker wellbeing visits and understand where there were opportunities for improvement.

Wates had a target of three worker wellbeing site visits in year one and four were achieved.

In year two, Wates intend to increase this number, with twelve visits already scheduled.

Working with Unseen, Wates have:

- Enhanced their modern slavery statement
- Updated their modern slavery governance
- Carried out worker wellbeing sites visits
- Improved awareness materials and created new Toolbox Talks as a response to site visits
- Strengthened response and remedy frameworks
- Provided training to supply chain members

Wates will be doing more work with Unseen to conduct a macro analysis of their supply chain. They will also be focusing in on targeted training for their procurement teams.

Wates' next steps involve expanding their role-specific training and working with Unseen to better understand the risks in their complex supply chains.

"Unseen has been a trusted and knowledgeable partner, supporting us to take a more informed and effective approach to addressing modern slavery risks."

We would encourage all organisations in the construction sector to engage with this topic, which is why we are sharing our experiences in this case study."

Want to make a real difference in the fight against modern slavery?

Join our growing business community and collaborate with like-minded organisations. Get in touch for a chat about how we can help your organisation implement best practices and drive positive change.

Visit us:

unseenuk.org/business

Contact us at:

business@unseenuk.org

0303 040 2888

