



ClwydAlyn Housing Modern Slavery Statement 2019

This statement is made in accordance with the Modern Slavery Act 2015. It explains the approach we are taking to prevent modern slavery and human trafficking from occurring within our Services, Workforce and Supply Chains.

Our Business

In April 2019 we consolidated the three housing associations into one, Clwyd Alyn, creating a much simpler governance structure and the launch of a new business plan and Mission 'Together to beat poverty'. The company employs over 760 staff and operates in local authority areas across North and mid Wales. We own, maintain, improve and rent 6,000 properties. We manage thirteen hostels and night shelters, eight extra care and four Care and Nursing Homes.

We have a desire to continue to develop more housing in the future. In line with our business plan we are doing more to support residents into work, training and volunteering. We are taking further steps to make our homes energy efficient and to make our neighbourhoods great and we are providing good food through a new business we are creating. We cannot do this alone and therefore we work with a range of partners, sub-contractors and suppliers who support us in the delivery of our services.

Introduction

We understand that the issue of slavery and human trafficking is a world-wide issue. Given the diverse nature of our business our focus is on the following key areas:

Housing Management

The allocation of our housing is based on need and demand; whilst we cannot control the allocation of housing stock we do, however, have regular access to people's homes for repairs, maintenance and housing management purposes. Any safeguarding issues raised by our staff or sub-contractors are dealt with through our Safeguarding Policy. All safeguarding referrals are tracked and monitored on an ongoing basis. They are reviewed annually by our Board Members.

Employment

As the Group offers a diverse range of services, we provide a range of employment opportunities. Our employees, agency staff, Board members and Resident volunteers are subject to identity checks and vetting procedures as required within our sector.

Pre-employment checks for staff are completed which includes right to work, Disclosure and Barring Services (DBS) checks and references. Recruitment agencies who place temporary staff are required to meet the Group's standards in relation to pre-employment checks.

We have Safeguarding and Equality & Diversity Policies in place. Our Employees, Board members and Resident volunteers regularly attend Safeguarding and Equality and Diversity Training.

We have a Code of Conduct in place for all staff and Board Members.

Building our Properties

The Group works with a range of suppliers to deliver new housing projects. The Contractors are responsible for and utilise a wide range of sub-contractors. They are responsible for maintaining a list

of approved Sub Contractors who must qualify in terms of financial capacity, health and safety, quality, experience, ability to work in the UK in order to contract with the main Contractor for work.

The main Contractors and Sub Contractors also utilise mainly local suppliers of materials through reputable companies. The use of local supply chains is promoted by Welsh Government and recorded in the Value for Wales Toolkit which records the number of local suppliers, materials, waste, training and summarised in an outturn report which is submitted to Welsh Government for each project.

Our suppliers for the construction of new building projects are selected from the Group's Framework of contractors all of which have been through an extensive vetting process in order to be successfully included. Design & Build package deal projects are also brought to the Group by Contractors outside of the Framework.

Regardless of the route, all main Contractors are required to be registered with 'Construction Line' which is a nationwide database of contractors vetted for financial capacity, health & safety and competence in order to be included on the list. The database is maintained by 'Construction Line' and Contractors are required to pay a fee for this service if they wish to be included and to then be able to tender for work. All main Contractors must demonstrate regulatory compliance.

Maintaining our Properties

Our suppliers for maintenance services complete a declaration to confirm they are not aware of, or subject to, any investigations within their supply chain in relation to Modern slavery or Human rights abuses.

Due Diligence and Risk Assessment Process

Our construction suppliers for new building projects (main Contractors) are assessed during each project for compliance with health and safety by the projects Principle Designer as required by the CDM regulations in the UK. The main Contractors are responsible for the health and safety compliance of their Sub Contractors. The Group employs an external consultant as a CDM Advisor on each project to ensure that the process is fully compliant throughout the construction process.

The Association engages the services of business suppliers and will continue to ensure that they have the required process in place to confirm t they are an ethical and moral employer in accordance with the Modern-Day Slavery Act before the awarding or commencement of any works.

Our recruitment and DBS processes are reviewed by our internal Auditors for compliance; the outcome is reported to our Group Assurance committee.

Progress on 2018/19 Priorities

Modern Slavery awareness training has taken place; supporting information is available to staff. Incidents of Modern Slavery are reported as part of our Safeguarding processes.

Specific training on County Lines has taken place this year.

A new Procurement strategy has been agreed as this is implemented, we will ensure that the necessary checks are being made regarding our suppliers.

A full review of the new volunteering policy has been implemented

Clare Budden

Group Chief Executive