



Grŵp Tai
PENNAF
Housing Group

This is the Modern Slavery Statement for Pennaf Housing Group for the financial year which ended 31 March 2018

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

Our Business

Pennaf Housing Group comprises the following operational entities – Pennaf, Clwyd Alyn Housing Association, Ty Glas Housing Society and Tir Tai. The Group employs over 650 staff and operates in local authority areas across North and mid Wales. We own, maintain, improve and rent 5778 properties. We manage twelve supported living projects, five extra care schemes with a further three under development and four Care and Nursing Homes.

We have a desire to continue to develop more housing in the future. We support people across our services to secure jobs; we provide learning and development opportunities and work hard to improve the living conditions of people across the region. We cannot do this alone and therefore we work with a range of sub-contractors and suppliers who support us in the delivery of our services.

The Group's primary purpose is 'Opening Doors – Enhancing Lives' which is delivered through a set of business priorities that are reviewed annually.

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 three primary 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.

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 attend training to support the implementation of the policies.

We have a Code of Conduct in place for all staff and our Board Members sign a Protocol Agreement.

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. The Contractors 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. The services used to deliver the projects are based in the UK and usually near the Group's areas of operation.

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 which the Group engages with 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. They also confirm that staff vetting procedures are in place.

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 ensure that they have in place the required process to ensure that 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 2017/18 Priorities

Modern Slavery awareness training has taken place; supporting information and videos have been cascaded to staff.

Specific training on County Lines is taking place this year.

As part of a wider ongoing review of procurement, we will establish a group wide risk assessment process to ensure that the necessary checks are being made regarding our suppliers.

A full review of the Group's volunteering process has been completed and a new policy developed; required changes will be implemented.

We will continue to develop our approach to tackling the issue of Modern Slavery.

Clare Budden

Group Chief Executive

25 September 2018