



ClwydAlyn

Working together to beat poverty

ClwydAlyn Modern Slavery Statement

2023

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Modern slavery can affect anyone. We understand it is a hidden crime with people becoming trapped in modern slavery because they are vulnerable to being tricked and exploited, often as a result of poverty and exclusion.

Modern Slavery is present in every area of the UK. The most recent statistics demonstrate slavery in Wales continues to be on the rise. In Wales during 2021, 479 referrals of potential victims of slavery were reported. This represents a 25% increase from 2020.

This statement is made in accordance with the Modern Slavery Act 2015. It provides an update on our work with our supply chain, staff and residents to raise greater awareness of Modern Slavery. It provides a progress update on our action plan along with setting priorities for 23/24.

Our Corporate Plan 2020-25

ClwydAlyn is a Housing Association working across all local authority areas in North Wales. In 2020, we developed a five-year corporate plan, building on our mission 'together to beat poverty'. Since developing our plan, across Wales the impacts of Covid 19, BREXIT and the war in Ukraine have been far reaching; with more people in our communities suffering income, food, and fuel poverty. The pandemic and cost of living crisis has disproportionately affected the poorest communities including those from ethnic minority groups, people with disabilities and young people from the LGBT communities.

The old challenges are now increasingly complex to address. People who are vulnerable are at risk of being exploited, drug dealing has become a more dangerous problem in our communities. We see increased safeguarding issues in our neighborhoods and concerns about targeted manipulation and harm for both younger and older people. We have redesigned our services to enable us to provide tailored interventions and support within our communities to help address these issues.

We partner with a range of organisations including those who build our homes and those who help maintain our properties, they typically work with several subcontractors to draw on specialist skills. More generally, our suppliers provide a range of goods and services including agency staff to meet critical staffing needs in our care services along with food, cleaning and other services.

During the last year, we have become increasingly aware of the positive impact of working with responsible suppliers can have as part of the thinking around the Foundational Economy. As our learning develops in relation to this model, there will be more we can do to make a positive impact in the communities where we work, and for the people we support.

Progress during 2022/23

We ran Modern Day Slavery awareness sessions for our Resident Committee and Procurement Champions. We worked with Business Wales to run an awareness programme for suppliers to increase their awareness of Tendering processes, including the principles of Ethical Employment and Modern-Day Slavery. We continue to run Safeguarding training for all staff.

We have updated our Whistleblowing policy and procedure which is available through our website; this provides clarity on how anyone external to ClwydAlyn, including our Residents, can raise concerns with us around Modern-Day Slavery; it

explains how they will be supported when they contact us. Our Safeguarding Policies were also reviewed during the year.

We have continued to proactively manage all Safeguarding issues working in partnership with Local Authorities taking steps to address the issues as they arise. We are dealing with increasingly complex situations within our communities with a range of staff teams supporting our residents; during the next year we will be running additional awareness sessions for all staff to ensure they are confident to raise any safeguarding concerns they may have.

Our Wellbeing and Inclusion Specialists along with our early Intervention Officers are now fully established in their roles. The focus of their role continues to be to support staff and residents when they are most vulnerable and to signpost them for specialist support.

We continue to be alert to the negative impact adverse childhood experiences can have on people throughout their lives. Having completed the Trauma Informed training for our key roles, we are now at a stage where we are measuring the impact of the changes we have made to the way we do things.

We continue to have an ambitious development programme to build new social housing in North Wales along with a comprehensive maintenance programme for our existing homes. We work with a range of suppliers who utilise a wide range of sub-contractors for this work.

We work with many suppliers for wider goods and services; during the last year, we have identified those supply chains where we believe there is a larger risk of Modern Day Slavery taking place. We have been gathering information on the policies and processes they have in place to manage the associated risk.

We have updated our tender documentation to request additional information on Modern Day Slavery and Ethical Employment during the different stages of our tender process. This includes whether the supplier has a policy in place and an action plan, whether the organisation has been subject to any investigations or charges in relation to Modern Day Slavery, whether the organisation applies the principles of the Real Living Wage. We also set out plans to audit this information. This applies to all tenders irrespective of whether the supplier's annual turnover meets the £36m threshold that requires a statement to be made.

We voluntarily submitted our Modern-Day Slavery Statement to the new Government registry.

Looking to the future

Supporting the most vulnerable in our communities is at the heart of our five-year Corporate Plan. This, coupled with our purchasing power, provides an opportunity for us to both refresh existing and develop new standards to support Safeguarding and Ethical Employment practices within our supply chain.

We have started to develop our Ethical Employment Policy and guidance which will set out the standards we adhere to and expect our suppliers to sign up to as part of their ongoing contractual relationship with ClwydAlyn. This will be completed during 23/24.

We will continue to engage with our suppliers to understand the policies and practices they have in place to mitigate the risks from Modern Day Slavery in their supply chain.

Our action plan for 2023/24 is as follows:

- We will consult on our new Ethical Employment Policy and guidance for approval by the end of December 23.
- We will continue to review our suppliers' Modern Day Slavery policies and guidance as part of our review of commercial arrangements; this will include the introduction of our new Ethical Employment Policy.
- We will raise awareness of our updated Whistleblowing Policy throughout our supply chain.
- We will run further Safeguarding and Modern-Day Slavery awareness events across the business.



Clare Budden

Group Chief Executive

ClwydAlyn.co.uk

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Landlord Cymdeithasol Cofrestredig / Registered Social Landlord (Rhif/Number L051) Wedi ei
hawdurdodi a'i rheoleiddio gan yr Awdurdod Ymddygiad Ariannol / Authorised and regulated by
the Financial Conduct Authority
Byddwn yn trin gohebiaeth a dderbynnir yn y Gymraeg a'r Saesneg yn gyfartal / We will treat
correspondence received in English and Welsh on an equal basis

