



**ClwydAlyn**

**Working together to beat poverty**

## **ClwydAlyn Modern Slavery Statement 2024**

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## ClwydAlyn Modern Slavery Statement 2024

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## ClwydAlyn Modern Slavery Statement 2024

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 because of poverty and exclusion.

Modern Slavery is present in every area of the UK. Their most recent figures show there were 16,938 potential victims of modern slavery referred to the Home Office in 2022, representing a 33% increase compared to the preceding year and the highest annual number since the NRM began in 2009. (Source National referral mechanism end of year summary 2022)

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 2024/2025.

## Our Corporate Plan 2020-2025

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, the impact of the cost-of-living crisis has been far reaching; with more people in our communities suffering income, food, and fuel poverty. The cost-of-living crisis is disproportionately affecting the poorest communities including those from some ethnic minority groups, disabled people, and young people from the LGBT communities. During next year, we will be developing our new corporate plan.

The challenges faced by our communities have become increasingly complex to address. People who are vulnerable are at greater risk of being exploited, drug dealing has become a more dangerous problem in our communities. We see increased safeguarding issues in our neighbourhoods and concerns about targeted manipulation and harm for both younger and older people. Our services have been redesigned and continue to evolve. We have created new roles providing early interventions for the most complex situations enabling us to provide tailored support within our communities to help address these issues.



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We partner with a range of organisations including those who build our new 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.




## Progress during 2023/2024

We ran Modern Day Slavery awareness sessions for our Resident Committee and provided further information through our Autumn Residents Newsletter. This included explaining what Modern Slavery can look like in our communities, signposting residents to key staff members and specialist organisations who can provide support and guidance. We continue to run Safeguarding training for all staff.

We work with many suppliers for our 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 and where our spend is highest.

Our updated tender documentation requiring additional information on Ethical Employment and Modern Slavery has now been embedded. This applies to all tenders irrespective of whether the supplier's annual turnover meets the £36m threshold that requires a statement to be made.

In all our procurement and tender activity, we ensure that all potential suppliers complete and return a Standard Supplier Questionnaire (SSQ). They are asked:

-  Do you have a Modern Slavery policy/statement in place?
-  Please confirm what actions and steps you take on an annual basis to ensure compliance.
-  Can you confirm you are not subject to (or have been subject to) any investigations or charges in relation to modern slavery?

The responses to these questions are evaluated and any concerns raised will prompt further clarification questions to ensure they meet the evaluation criteria. The successful supplier awarded the contract will be asked to



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respond to these questions and evidence compliance on an annual basis as part of the ongoing contract management process.

Where we have a supplier in place that hasn't gone through a formal tender process or is procured via a framework contract, we have collated information to confirm they have adequate policies and processes in place to manage the associated risk of Modern Slavery by asking the SSQ questions and evaluating responses.

For any new supplier there are mandatory checks that must be completed before they can be added to our approved suppliers list. Where proportionate and appropriate we will ask them to supply a modern slavery statement/or explain reasons for not having a statement as part of the checks.

We have maintained our commitment to pay the Real Living Wage and voluntarily submitted our Modern-Day Slavery Statement to the new Government registry.

We recognise the impact adverse childhood experiences can have on people throughout their lives and, in turn, our local communities. Having completed the Trauma Informed training for our key roles, we are measuring the impact of the changes we have made to the way we do things.

## Looking to the future

Supporting the most vulnerable in our communities is at the heart of our five-year Corporate Plan which will continue to be a key theme within our next Corporate Plan being developed during this year.

We will continue to complete pre-checks during the tender process and with the new supplier set up. Any suppliers who do not comply with the Modern Slavery Act will automatically be excluded from procurements or delivering services.

It is our intention to introduce spot checks next year as part of our ongoing contract/supplier management process.

We are drafting our Ethical Employment Policy to reflect the requirements of the new Welsh Procurement Policy Note.



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## Our action plan for 2024/25 is as follows:

-  We will continue to review our suppliers' Modern Day Slavery policies and guidance as part of our commercial arrangements; we will introduce spot checks as part of our account management processes.
-  We will implement our new Ethical Employment Policy.
-  The review of our Pay Policy will include our commitment to the Real Living Wage

**Clare Budden**  
Group Chief Executive

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