

Modern Slavery and Human Trafficking Statement

August 2025



Introduction

Hafod Housing Association Limited (we/our/us) present our annual statement pursuant to the provisions of Section 54 of the Modern Slavery Act 2015 (the Act) for the financial year ending the 31st of March 2025. This statement is produced on behalf of the Hafod Housing Association Limited and all subsidiaries.

This annual statement is intended to:

- outline our commitment to modern slavery and human trafficking matters.
- set out the measures we have in place to mitigate our modern slavery and human trafficking risks; and
- outline our recent activity and continuous improvement actions to further mitigate our risks.

About Hafod Housing Association Limited

Hafod is a mission-led, values-based not-for-profit organisation focused on building communities through great housing and support services. We deliver high-quality affordable homes and support for people to maintain their independence and well-being for as long as possible. We also provide care to people in their own homes, in supported housing or in our residential care and nursing homes.

Our missions, get the basics right, connect with you, and invest for a better future, all focus on our vision which is to play our role in helping communities thrive by hearing people's voices, giving support when it matters, on the terms people want.

We recognise that we work in an area that could be susceptible to the risks of modern slavery and human trafficking, especially as we work with vulnerable groups within society including people who experience homelessness and disabled people.

Commitment

In compliance with the Modern Slavery Act 2015, we are committed to preventing modern slavery and human trafficking in all our activities and ensuring that our supply chains are committed to the same aim.

Responsibilities

The **Hafod and Hendre Boards** have overall responsibility for this statement and the organisation's response to the Modern Slavery Act 2015.

The **Executive team** is responsible for putting in place measures that ensure compliance with the legislation and for monitoring compliance.

Line managers are responsible for engaging with their team to implement policies and procedures and ensuring that their teams are aware of the responsibilities and receive appropriate training.

Employees are responsible for carrying out their work in line with the policies and procedures and for applying Hafod's values and behaviours in everything they do.

Risk

When assessing our risks in relation to modern slavery and human trafficking they fall into four categories:

Risk categories

1. Recruitment, induction, and employment
2. Policies, procedures, and ways of working
3. Learning and development
4. Supply chain

We are always looking at ways in which we can improve our processes to further mitigate risks. We have outlined below our current process, recent activities, and our continuous improvement actions.

1. Recruitment, induction, and employment

As a large employer we recognise that we need to be alert to the potential risks of modern slavery and human trafficking in our recruitment, induction, and employment practices. To mitigate against these risks the following controls and measures are in place:

- In order to be offered employment with us all applicants go through a robust selection process that includes an interview.

- We conduct a number of mandatory checks, in respect of eligibility to work in the UK, as well as safeguarding practices, reference and imposter checks.
- Our checks apply to all appointments whether employment is permanent, temporary, or fixed term.
- All colleagues are provided with a clear contract of employment, which complies with legislation.
- All laws and standards related to wages, benefits, working hours and minimum age are adhered to.
- Any young person employed below the age of 16 is subject to a robust risk assessment with measures in place to ensure that risks are mitigated.
- All new starters are enrolled onto training that will help them understand where they can go for help should they need it.

Agency workers

- We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers.
- We use a Preferred Supplier List (PSL) of recruitment agencies for temporary resources in our care and support teams. These agencies have been through a rigorous selection and vetting process. The agencies on our PSL have agreed to complete all the necessary vetting and checks on their workers and Hafod can ask for evidence of this at any time.
- We conduct regular service reviews with the agencies on our PSL to maintain a high standard of service and address any concerns.
- We vet any new agencies or partners that we work with who supply resource to make sure they comply with modern slavery and human trafficking best practice.

Recent activity and continuous improvement

- We have rolled out a new right to work checking process designed to streamline and improve efficiencies around inclusivity and sponsorship, particularly in areas like DBS (Disclosure and Barring Service) and Right to Work (RTW) checks. This initiative aims to simplify administrative burdens while fostering a more diverse workforce.
- The process comprises key components of Electronic Forms for Sponsorship/DBS and RTW Checks. This digital transition has reduced processing time, improved accuracy, enhanced accessibility, and increased security relating to sensitive personal data.
- A RTW Guide for Managers has been created to provide clear support and guidance in the often-complex area of Right to Work checks. This resource has helped managers navigate the legal requirements surrounding RTW checks, reducing the risk of non-compliance whilst also providing clarity on the process.
- We have developed additional reporting on overseas workers ensuring that necessary compliance checks are completed. These reports are made available to managers weekly and are used by the HR team to proactively manage cases, thus ensuring compliance.
- We have been granted a Sponsorship license by the Home Office whereby we are in receipt of a number of sponsorship licenses annually. When sponsoring overseas workers, we ensure that the role they are being offered is a genuine vacancy and the individual has gone through a selection process. We make sure that we fulfill our responsibilities in terms of record keeping and reporting the activity of sponsored workers to the Home Office.
- We are currently in the process of re-tendering our Preferred Supplier List (PSL) for our agency workers and are looking at ways to improve how we work with agencies and select colleagues.
- We have recently strengthened the Right to Work clause within our Agency Supply Terms and Conditions.
- We continually look at ways to improve our processes and checks to ensure that our employment obligations are met.

2. Policies, procedures and ways of working

We operate a number of policies and procedures that describe our approach to the identification and prevention of modern slavery and human trafficking risks. These include:

- **Modern slavery and human trafficking policy and procedure (to be reviewed November 2025)**

This policy and procedure sets out how we understand all potential modern slavery risks related to our business and outlines the steps we have put in place aimed at ensuring that there is no slavery or human trafficking in our own business or in our supply chains. The policy and procedure also provide employees with clear guidance on Hafod's and their responsibilities relating to modern slavery and human trafficking including how to report concerns. Our policies and procedures are updated bi-annually as a minimum or as legislations changes.

- **Whistleblowing policy and procedure (Raising concerns at work policy and procedure) (to be reviewed December 2025)**

We encourage all our colleagues to report any concerns related to the direct activities, or the supply chains of our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our Raising Concerns at Work policy and procedure is designed to make it easy for colleagues to make disclosures, without fear of retaliation and includes our grievance, safeguarding and whistleblowing policies. Colleagues can raise any concerns confidentially through the policy which includes raising concerns directly with their Line Manager, the People Team, or Hafod Boards.

- **Employee code of conduct (Reviewed May 2025, next due for review May 2027)**

Our code makes clear to employees the actions and behaviors expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour in line with our values: Working together, Respect, Professional, Learning and improving and Great service.

- **Anti-Bribery and corruption policy and procedure (Reviewed June 2025, next due for review June 2027)**

In this policy and procedure, it sets out that it is Hafod's policy to conduct all business in an honest and ethical manner and how we take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships. The policy and procedure set out employees' responsibilities in dealing with anti-bribery and corruption matters including how to report any concerns.

- **Principles and behaviour framework**

Our principles and behaviour framework was developed in the summer of 2022 through consultation and discussion with our colleagues. The framework was introduced to all colleagues, and we have held numerous training sessions on the framework since its launch.

The principles are the guides we use to create consistent and recognisable experiences for customers and colleagues, defining how we work as an organisation.

Our behaviours describe how we expect our colleagues to act as individuals and how we work together to deliver consistent Hafod experiences. They reflect a range of behaviours from communication and influencing to delivering results. They help colleagues be more effective in their working lives, so that together we deliver our best work for those we support and those who support us. Behaviours allows us to break down our principles into individual action and approaches that can be taken by everyone to help us achieve our goals, deliver great service and grow.

3. Learning and development

We provide mandatory training through our Learning and Development team to ensure our employees have full awareness of modern slavery and human trafficking matters, as well as other related policies including safeguarding, raising concerns at work, and equality and diversity. Our mandatory training includes:

- **Anti-bribery eLearning**

All colleagues are required to complete Preventing Bribery eLearning Course every two years. This course provides an overview of the Bribery Act 2020 and the individuals responsibility within it.

- **Safeguarding level 1**

As part of our training framework all colleagues are expected to complete our Safeguarding training. This training enables colleagues to recognise the signs of abuse, how they can help reduce the likelihood of abuse occurring and how to respond to suspected or disclosed abuse. It examines national policies, local systems and Hafod's policies and procedures. All colleagues are required to complete Safeguarding level 1 training and complete a refresher module every three years. Safeguarding level 1 meets the Category A standards as set out by the National Safeguarding Standards.

- **Safeguarding level 2**

All our frontline colleagues in Care, Support and Housing complete Safeguarding level 2 training. This training provides learners with a deeper understanding of safeguarding procedures. This includes an overview of the specific responsibilities under the Social Services and Wellbeing (Wales) Act 2014 and the steps that colleagues can take to minimise the risk of abuse or neglect. Safeguarding level 2 meets the Category B standards as set out by the National Safeguarding Standards.

- **Safeguarding level 3**

Leaders and managers who are directly responsible for the care of adults complete Safeguarding level 3. This training helps supervisors to provide support to colleagues should issues of safeguarding occur and provides an overview of the required safeguarding reporting procedures. Safeguarding level 3 meets the Category C standards as set out by the National Safeguarding Standards.

- **Additional learning**

As part of our induction training, colleagues also complete learning around EDI and our Raising concerns at work policy and procedure. Raising concerns at work is covered verbally during induction training (Welcome to Hafod and Welcome to Care) and EDI is completed via an eLearning module.

As an organisation focused on support and care, our colleagues also complete role specific training which equips them to provide support to customers who experience a range of difficulties. This learning forms part of an individual's training plan, compliance of which is monitored monthly along with mandatory training and reported to the Executive team monthly and Boards quarterly.

- **Contract management training**

Specific training has been delivered to colleagues identified as having contract management responsibilities highlighting risks around modern day slavery and how this can be managed through comprehensive contract management.

- **CIPS Ethical Procurement and Supply**

Hafod's Procurement team undertake the annual Chartered Institute of Procurement and Supply (CIPS) Ethical Procurement and Supply certification which focuses on ethical procurement highlighting risks around modern-day slavery, human rights, bribery, fraud and corruption.

Recent activity and continuous improvement

- We constantly monitor our learning and development compliance, and all training is recorded on our training compliance dashboard. The dashboard is shared with all line managers across the organisation to check that the relevant e-learning and training has been completed.
- We review our training materials and training allocation on a regular basis to ensure they remain fit for purpose.

4. Supply chain

We are committed to ensuring that our suppliers adhere to the highest standards of ethics as well as the Modern Slavery Act 2015. We recognise that there are modern slavery and human trafficking risks with our supply chains as we have limited control over their recruitment, employment, induction, and training practices. To mitigate these risks, we have put in place the following measures:

- As a condition of our contracts, suppliers are bound by legislation which includes the Modern Slavery Act 2015. As with all contract breaches of legislation, it would invoke the option to terminate or put in place improvement plans to continue working with the Hafod.
- We undertake due diligence when considering taking on new suppliers and regularly review existing suppliers. This includes conducting modern slavery checks which enable us to assess the suppliers' risks and ensure that the organisation tendering complies with the modern slavery act 2015.

Recent activity and continuous improvement

- We have introduced a risk assessment for new procurement tender activities which highlights any modern-day slavery and human trafficking risks.
- We are creating an internal supplier database which highlights risks relating to modern day slavery and human trafficking based on the sector in which they are operating and where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking which is suitable for the full breadth of our supply base.
- We will continue to improve our contract management and vetting of suppliers using a risk-based approach, reviewing, and updating information at supplier review meetings.
- We have reviewed and updated our general terms and conditions and supplier code of conduct to ensure that they are compliant and up to date and reflect the values and behaviours that Hafod expect, these have been published on our website.

- All new procurements under the Procurement Act 2023, review Suppliers against the government debarment list which identifies suppliers who have breached Modern Slavery Act 2025, and those suppliers are removed from the procurement activity. This legislation also allows Hafod to terminate a contract with a supplier who has been placed on the debarment list, after being awarded a contract.

Signed

A handwritten signature in black ink, appearing to read 'Jas Bains', written in a cursive style.

Jas Bains | Chief Executive



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