



# Modern slavery and human trafficking statement

**Making Lives Better**

## Introduction

Hafod Housing Association Limited (we) present our annual statement pursuant to the provisions of Section 54 of the Modern Slavery Act 2015 (the Act) for the year ending 31 December 2021. 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 the actions that we have taken in 2021 to further strengthen our controls and measures.

## About Hafod Housing Association Limited

Working throughout south Wales, we provide a wide range of housing, support, and care services. The services we provide include the provision of high-quality affordable homes and supporting people to maintain their independence and personal well-being in their own homes, supported housing or in a residential care setting.

Our mission is to Make Lives Better and our vision is to improve health, well-being, and prosperity in communities by helping to integrate the systems of housing, health, social care, and support.

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.

## 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 free from slavery and human trafficking.

## 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 are responsible for putting in place the 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.

## Recruitment 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 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 and reference 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.
- No young persons may be employed below the age of 16.
- All new starters are enrolled onto training that will help them understand where they can go for help should they need it.

## Agency working

We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers.

## Policies

We operate a number of policies and procedures that describe our approach to the identification of modern slavery risks and steps to be taken to prevent modern slavery and human trafficking in its operations. These include:

### Modern slavery and human trafficking policy and procedure

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 legislation changes.

### Whistleblowing policy and procedure (Raising concerns at work policy and procedure)

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 Hafods Boards.

### Employee code of conduct

Our code makes clear to employees the actions and behaviour 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
- Great service

### Anti-Bribery and corruption policy and procedure

In this policy and procedure it sets out that Hafod's policy is to conduct all of our 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 sets out employees' responsibilities in dealing with Anti-bribery and corruption matters including how to report any concerns.

## Training

We provide 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 training includes:

### Anti-bribery eLearning

Identified colleagues are required to complete The Bribery Act 2010 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 Adults level 1 online 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.

### 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 Care Act 2014, and the steps that colleagues can take to minimise the risk of abuse or neglect. The modern slavery content of Safeguarding level 2 was revised and updated in 2020.

### 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.

## Additional learning

We have a resource library on our learning management system which provides further information should any of our colleagues need any additional information or support with regards to human trafficking, forced labour, servitude and slavery.

As part of our induction training, colleagues also complete e-learning around EDI and our Raising concerns at work policy and procedure.

## Supply chains

We are committed to ensuring that our suppliers adhere to the highest standards of ethics. They are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

We work with suppliers to ensure that they meet the standards of the code and improve their employees' working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.

As a condition of tendering for our contracts, suppliers who are required to produce a Modern Slavery Statement must evidence this. Those who are not required to hold a Modern Slavery Statement, or those who's Statement we consider insufficient, must agree to utilise this document as a condition of the contract.

## Supplier/Procurement code of due diligence

We undertake due diligence when considering taking on new suppliers, and regularly review existing suppliers. Our due diligence and reviews include:

- Mapping the supply chain broadly to assess particular products or geographical risks of modern slavery and human trafficking.
- Evaluating the modern slavery and human trafficking risks of each new supplier.
- Conducting supplier audits or assessments through the organisation's own colleagues, which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers through and requiring them to implement action plans.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

## Our ongoing approach

We ensure that our policies and practices remain up to date. This ensures that we are fully aware of and compliant with the steps we need to take against modern slavery and human trafficking.

## Actions taken in 2021

We are always looking at ways in which we can improve our processes and ways of working to further mitigate any risks of modern slavery and human trafficking. In 2021 we have carried out the following:

- Reviewed our Raising Concerns at Work Policy and Procedure with various parties and made changes based on their recommendations.
- Initiated a project to create a Preferred Supplier List (PSL) for the recruitment of Agency colleagues.
- Carried out an audit of our recruitment practices across our Homecare business which concluded in January 2022 and resulted in a reasonable assurance rating and action plan.
- Delivered our HR System (MyHafod) to improve and automate onboarding processes.
- Audited the implementation MyHafod to verify that the required processes are in place to ensure that the system is compliant with relevant legislation. The actions coming out of this audit have been completed.
- Reviewed and updated our key policies and procedures in line with our policy framework.
- Updated MyHafod to enable colleagues to update their personal details including bank details, with additional checking processes in place including an automated reminder process to prevent expiry of RTW documents and DBS checks.
- Updated our onboarding processes to encompass right to work checks including the changes to settled status.
- In June 2022 in line with the settled status regulation we updated our onboarding processes to encompass the new right to work checks, we also verified colleagues right to work and provided support and signposting for colleagues on how to apply for settled status in the correct way.
- Commenced a project to implement registration with the Ethical Employment in Supply Chains Code of Practice which identified that it is not compatible with the Welsh Micro and SME supply base.

## Our plans for 2022 are as follows:

- Introduce a Preferred Supplier List and contract for all our Agency recruitment. This process will tighten our processes relating to the recruitment of Agency colleagues.
- Further review and tightening of our HR Governance process to ensure appropriate checks are in place throughout the recruitment and onboarding processes to ensure compliance with all relevant regulation and legislation.
- Integrating our recruitment system (Blue Octopus) with MyHafod to improve, automate and streamline processes for managers and applicants.
- Implementing a Principles and Behaviour framework throughout the organisation which will set out what Hafod does and what is expected of individuals
- Improving our VISA checking process.
- Identifying a suitable ethical supplier database, 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.



**Jas Bains**

Chief Executive

Hendre Group Limited

Dated: 21 June 2022