Tai Tarian - Modern Slavery Act Annual Statement 2022/23

Introduction

This statement is made under section 54 (1) of the Modern Slavery Act 2015. It constitutes our slavery and human trafficking statement for the financial year ending 31st March 2023. Our turnover for the period exceeds £36m (the minimum set by the Act for the requirement to make a statement).

Tai Tarian is one of the largest social landlords in Wales and we have responsibility for over 9,000 properties across the Neath Port Talbot County Borough. We are committed to providing good quality housing and a range of services to help people manage their homes. As a community housing mutual, we continually work to understand the needs of our contract holders and members to deliver services based on what matters.

We are much more than a landlord, we incorporate traditional housing provision, support services for the vulnerable, a repairs and maintenance service and operate a letting service offering affordable accommodation to people who reside/work in the Borough on low income.

We recognise that we operate in an environment that could be open to the risk of modern slavery and human trafficking primarily as we support people in vulnerable groups in society, including homeless people and people with learning disabilities.

We are committed to doing what we can to combat slavery and human trafficking. Our anti-slavery and human trafficking statement reflects our commitment to acting ethically and with integrity in all our business relationships. We have implemented controls in our systems that seek to ensure that slavery is not taking place anywhere within our supply chain or any part of our business. We do not knowingly engage with suppliers or others engaged in modern slavery or human trafficking.

We are based and operate solely within the UK. The majority of our suppliers operate within the United Kingdom. We have identified that, as an organisation, our exposure to the risk of slavery and human trafficking is low.

Policies/Procedures

Our policies and procedures reflect our commitment to acting ethically and with integrity in all our business relationships:

- Employees - We have an Employee Code of Conduct and Behaviour Framework which sets out how we expect the highest standards of employee conduct and ethical behaviour in delivering our services and when representing Tai Tarian.
- Fraud policy – We are committed to the highest standards of quality, probity, openness and accountability and, as part of this commitment, provide a confidential reporting process for employees to report serious concerns about any aspect of our service provision or the conduct of officers or others acting on our behalf.
- Whistleblowing policy - We encourage a culture of openness, integrity and accountability. Our Whistleblowing policy sets out how staff and other persons can raise any concerns and express them in confidence without fear of any reprisals.

Due diligence processes for modern slavery and human trafficking

We take appropriate steps to ensure that there is no modern slavery or human trafficking in our supply chains or any other area of our business. These steps include:

- Working with external partners – our partnership work with South Wales Police tackles the issues affecting our communities in order to improve safety and security, including “County Lines” drugs activity. By working jointly with our partners, we have identified and assisted vulnerable contract holders whose homes have been used by others including to deal drugs.
- We identify tenancy related concerns including ones of a safeguarding nature and make/record the necessary referrals to Social Services and other appropriate partner agencies. All staff are required to undertake training on safeguarding awareness, with additional training provided for staff who are responsible for managing cases involving safeguarding issues.
- Procurement process - Our procurement process is committed to ensuring that our suppliers adhere to the highest standards of ethics as part of the procurement process. Suppliers are required to demonstrate that they provide safe working conditions, treat employees with dignity and respect and comply with relevant employment and equality and diversity legislation.

- Tender process - Our tender documentation requires our suppliers with a turnover of £36m or higher to take appropriate steps to ensure that there is no slavery or human trafficking in their supplier chains. To monitor compliance, we ask for copies of their Modern Slavery Act statements and associated policies.
- Recruitment – Our recruitment and people management systems are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion once in our employment.
- Agency staff – We receive confirmation from the recruitment agency that individuals recruited via the agency have satisfied the necessary eligibility checks to ensure legal entitlement to work in the UK.
- Employee support – We have support services available to staff so they can speak in confidence and anonymously about any harassment they have experienced inside or outside of the workplace.
- Employee training – mandatory training is provided to all staff in Safeguarding and Modern Slavery.
- Applicants - Our process to sign up new contract holders is set up so that we undertake a robust process to ensure that they are who they say they are, which includes background and identification checks. If applicable, references are sought.
- Contract holders - We undertake two visits during the first year of a tenancy to ensure that we know the contract holders in our properties. Housing staff manage any mutual exchanges with our properties. We always investigate any allegations from residents or the wider community regarding potential tenancy fraud or unusual circumstances/activity.
- Tenant support – Our initiative called Protecting People & Property equips staff to recognise the signs of contract holders who are vulnerable or suffering abuse. A robust reporting mechanism is in place for staff to raise any concerns. Our Tenancy Management Register (TMR) is used to identify risks to a tenancy. This specifically looks at whether the tenant has any vulnerabilities which would put them at risk. The TMR is a way of both recording and identifying any risk and putting in appropriate measures and actions to help support our contract holders. This often involves a multi-agency approach.

- Our new housing service standards have a target of visiting all properties during the next two years, finding out about our contract holders' circumstances and checking if we can be of assistance or signposting to a relevant organisation.

This statement has been reviewed by the Chief Executive and approved by Tai Tarian's Board on 22nd June 2023. It will be reviewed and updated as necessary annually.

Signed: Linda Whittaker	*Chief Executive*	*Date: 22/06/2023*
Signed: Jonathon Davies	*Board Chair*	*Date: 22/06/2023*