ClwydAlyn

Working together to beat poverty

ClwydAlyn Modern Slavery Statement

2025



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ClwydAlyn Modern Slavery Statement

2025

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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. Ther 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 25/26.

ClwydAlyn is committed to preventing modern slavery and human trafficking. We recognise our responsibility to uphold the principles of fairness, equality, and human rights, and we are dedicated to taking proactive steps to identify, address, and mitigate the risks of modern slavery and human trafficking.

Our Corporate Plan 2020-25

ClwydAlyn is a housing association working across North Wales delivering a wide range of housing management related services in Denbighshire, Flintshire, Conwy, Wrexham, Powys, Gwynedd and the Isle of Anglesey.
Our homes and services include social family housing and single person accommodation, supported living accommodation and specialist care and nursing services, low-cost home ownership, leasehold management services and intermediate and market rented housing.

We are much more than a social housing provider. We make a significant contribution to the North Wales economy both as an employer and as an investor with a significant capital spend. In addition, we source 80 per cent of goods, trades and services locally. Fo every £1 spent on developing new homes, £1.60 is reinvested into the local economy.

In April 2025 we developed our new five-year corporate plan with a mission, “Together, we will end Poverty”.

Five years ago, we set out our purpose at ClwydAlyn to achieve a Wales with NO POVERTY. We imagined how different Wales would be if we had no poverty - a place where everyone has access to high quality, affordable homes that they can afford to heat, where they can afford the food, they need to stay healthy, and where they have good employment and volunteering opportunities and live in communities where they feel they belong.

Progress during 2024/25

We continue to run Safeguarding training for all staff.

We work with many suppliers for our wider goods and services; during 2024/25, we have

monitored those supply chains where we believe there is a larger risk of Modern Slavery taking place and where our spending is highest.

Following on from the Procurement group project completed in August 2023 we have from August 2023 to date identified and prioritised several services that were supplied by multiple providers in services which we believed to have a higher risk regarding Modern Slavery. None of these services were under contract and had not been procured previously, nor had any benchmarking or service reviews taken place. As well as the opportunity for delivering efficiency savings we highlighted that on successful commissioning and procurement of these services that there would be further opportunity to put in place a coordinated and effective contract/supplier management process for these contracts to ensure that regular contract KPIs were being delivered and due diligence, including adherence to the Modern Slavery Act were in place and a standard contract management agenda item.

We have completed the procurement of our Agency services, Aids and Adaptations service, Specialist Cleaning services, Meal and Food service to our Extra Care schemes, Scaffolding services and Pest Control services where our new suppliers had to demonstrate their awareness and policy in respect of Modern Slavery in their tender submission and prior to the commencement of contract.

Our updated tender documentation requires potential providers to evidence and provide additional information on their approach to Ethical Employment and Modern Slavery and contract management reporting KPIs will be agreed with each supplier to evidence that they are compliant with the Modern Slavery Act and that they are monitoring their supply chain to ensure compliance. 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 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 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 and onto our finance system. Staff requesting the new supplier set up will also need to complete an automated Microsoft form that evidences the supplier has provided evidence of a policy or process regarding Modern Slavery. 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.

We are in the process of rolling out our new contract management process in 2025 across all teams and Modern Slavery will be a reporting KPI in all contracts/ for main suppliers and we will introduce spot checks next year as part of our ongoing contract/supplier management process.

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

Our action plan for 2025/26 is as follows:

- We will continue to review our suppliers' Modern Slavery policies and guidance as part of our commercial arrangements; we will introduce spot checks as part of our contract 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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