



# Modern slavery and human trafficking statement 2023

**Making Lives Better**  
Building communities and making connections

## 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 2023. 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

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 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 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.

## 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

As 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 a face to face interview.
- We conduct a number of mandatory checks, in respect of eligibility to work in the UK, as well as safeguarding practices, references and impostor 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 person is 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 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 resource 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 undergone a full audit of our colleague right to work documentation to identify compliance and improvements to processes. We plan to roll out a new right to work checking process during Sept 2023 to improve efficiency and compliance.

We have developed robust reporting on the right to work status of all our colleagues which is produced monthly and sent to all line managers in the relevant services. We proactively manage the cases outlined in these reports to ensure that we have valid right to work documents for all colleagues which includes renewals.

We have recently been granted a Sponsorship license by the Home Office. 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 have reviewed our Preferred Supplier List (PSL) and met with agencies to further improve processes and ways of working.

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 Dec 2023)

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 Oct 2023)

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's Boards.

### Employee code of conduct (to be reviewed Sept 2024)

Our code makes it 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 principle and behaviours framework which was introduced in 2022, more details of which can be found below.

### Anti-Bribery and corruption policy and procedure (to be reviewed Dec 2023)

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. It demonstrates that we 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.

## Recent activity and continuous improvement

2022 saw the launch of the **Hafod Principle and Behaviours framework** to all teams across the organisation. In the last nine months the people team have held over 20 training sessions to support the initial launch. The organisation's behavioural framework is being weaved into all people policies and information and is also replacing our focus on values in all our corporate literature. We have also taken the approach of including the behaviours in our attraction and recruitment processes to help potential new colleagues understand Hafod's expectations.

Our principles are the guides we use to create consistent and recognisable experiences for our customers and colleagues. They define what we do as an organisation and how we work.

Our behaviours describe how our colleagues 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. Our Behaviour framework 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.

Our policies and procedures are reviewed every three-years in line with our policy framework and with our policy committee. As outlined above a number of our policies and procedures will be reviewed in 2023.

### 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

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 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. Non-frontline colleagues complete safeguarding Level 1, frontline colleagues complete level 2 and frontline managers complete Level 3.

#### 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

As part of our induction training, colleagues also complete e-learning around equality, diversity and inclusion (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 supports them to provide support to customers who experience a range of difficulties. This training 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 to Boards quarterly.

## Recent activity and continuous improvement

We constantly monitor our learning and development compliance and have recently reviewed and updated 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 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 ensures 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. Here suppliers can also be checked for their labour standards, compliance in general, and modern slavery and human trafficking awareness procedures 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 continually review and update our general terms and conditions and supplier code of conduct to ensure that they are compliant, up to date and reflect the values and behaviours that Hafod expect.



**Jas Bains**

Chief Executive  
Hendre Group Limited

Dated: August 2023