



Modern Slavery Statement 2018-2019

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Modern slavery is a crime and a violation of human rights. It takes various forms, including slavery, servitude, compulsory labour and human trafficking for exploitation and can have a significant adverse impact on individuals, families and communities across the world.

This statement sets out the steps that Adra (Tai) have taken during the financial year April 2018 – March 2019 to minimise the risks of any association with practices which undermine the principles of safety and dignity for our customers, colleagues and supply chains.

This statement is an expression of our commitment to improving our practices to combat modern slavery and human trafficking in our corporate activities and supply chains.

Introduction

Adra (Tai) is North Wales' largest housing association, providing over 6,300 homes across North Wales to those in housing need. We provide quality, affordable homes and services to our tenants and strive to protect and develop the culture and heritage of the communities we serve as we do so.

We are responsible for the management and maintenance of a varied and diverse housing stock, which includes 400 sheltered units for older and more vulnerable individuals. We manage a number of supply chains across our business to help build, manage, and maintain our homes to a high standard.

Adra (Tai) is committed to conducting its business in a socially responsible way in accordance with appropriate ethical standards. We are dedicated to acting with integrity in all our business relationships and enforcing effective processes and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. Adra (Tai) ensures that the highest level of integrity is maintained throughout all areas of our business by promoting our four core values:

- **Fair** – We act fairly and impartially, respecting the dignity and individuality of everyone
- **Accountable** – We take responsibility for our decisions and actions and for finding solutions
- **Open** – We are trustworthy and transparent in the way we work and make decisions
- **Ambitious** – We are a dynamic and ambitious organisation that supports innovation and creativity, and seek opportunities to enhance all aspects of our business

Organisation Structure & Business

To ensure the success of Adra (Tai), it is vital that the organisation is governed effectively for the benefit of our customers. Adra (Tai) has a Board of Management with 12 members; four are Adra (Tai) tenants, six are independent, and two have been nominated by Gwynedd Council. The Board and Committees oversee Adra (Tai)'s executive management team.

Adra (Tai) employs 315 staff, providing over 6,300 homes across North Wales. The majority of our stock is general needs housing, but also includes sheltered and supported housing.

Adra (Tai) is registered with and regulated by the Welsh Government. We are registered, with charitable rules, under the Co-operative and Community Benefit Societies Act 2014.

What have we achieved in the last 12 months?

During the financial year April 2018 – March 2019, Adra (Tai) have taken a number of proactive steps to protect against the risk of modern slavery and human trafficking in our supply chains. For example:

- We continue to work through the Action Plan which details the activities we will be undertaking to implement each of the commitments within the Code of Practice;

- We have delivered Modern Slavery training to front line staff and senior managers within the organisation. The training was delivered by Unseen UK, North Wales Police and Welsh Government.
- We hosted the first joint event in Wales on Welsh Government's Code of Practice – Ethical Employment in Supply Chains in association with Cyngor Gwynedd, Cyngor Ynys Môn, Prifysgol Bangor University and Grŵp Llandrillo Menai. The event was attended by over 50 suppliers, many of whom themselves became signatories to the Code as a result of the event.
- Adra (Tai)'s Procurement Manager was invited to speak at Welsh Government's Code150 event in Wrexham, which was held to commemorate the 150th sign up to the Code.
- We have developed a Supplier Code of Conduct, which sets out the minimum standards of behaviour and practice expected of our Suppliers and their sub-contractors.
- We have developed and implemented a Sustainable Procurement Policy, which seeks to ensure that our procurement activity supports the underpinning principles and key themes contained within Adra (Tai)'s Corporate Plan 2019-2022 and the priority themes contained within Adra (Tai)'s Community Strategy 2018 – 2030.
- We continue to review and update our procurement processes to ensure that consideration is given to supplier's employment practices.

Policies

Adra (Tai) operates the following policies:

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| • Staff Code of Conduct | • Equality & Diversity Policy |
| • Supplier Code of Conduct | • Anti-Bribery & Anti-Fraud Policy |
| • Code of Conduct for Board Members | • Health & Safety Policies |
| • Contract Procedure Rules | • Recruiting & Selection Policy |
| • Sustainable Procurement Policy | • Domestic Abuse Policy |
| • Whistleblowing Policy | • Financial Regulations |
| • Safeguarding Vulnerable Groups Policy | • Standing Orders |
| • Dignity at Work Policy | |

Due diligence and Risk Management

Adra (Tai) are aware that the construction industry is more susceptible to modern slavery and human trafficking than many other sectors, even for those companies operating solely within the UK. As we commission construction and refurbishment projects for our properties, we effectively operate in a 'high risk' sector.

Adra (Tai) have implemented a number of actions to mitigate the risk of modern slavery or human trafficking in the delivery of its services and supply chain. For example, all contractors on Adra (Tai)'s Approved Contractor Register are asked to sign Adra (Tai)'s Supplier Code of Conduct, which sets out the minimum standards of behaviour and practice expected of our Suppliers and their sub-contractors. As at 31 March 2019, 85 suppliers had signed up to our Code.

The tendering of new contracts includes an obligation that suppliers comply with the Act and not engage in any activity that is contrary to the Act. The selection criteria include questions relating to the supplier's employment practices and compliance with the Act. Specifically, all new contracts include clauses which ensure that the suppliers comply with all statutory obligations relating to health, safety and welfare, environment, modern slavery, employment rights and relations, working rights, human rights, and equality. Furthermore, Adra (Tai)'s Supplier Code of Conduct is included with every new contract opportunity published.

Adra (Tai) have a zero-tolerance approach to modern slavery and human trafficking. We include contractual terms in or commercial agreements with suppliers to require them to comply not only with applicable legislation, but also with specific provisions regarding the treatment of individuals.

Adra (Tai) Supply Chains

Adra (Tai) have identified their supply chain as one of the main areas of risk and exposure to modern slavery. Adra (Tai)'s Supply Chain is primarily focussed around construction, professional services, utilities and facilities management. In 2018-2019, we used over 400 individual suppliers across a wide range of goods, works and services.

Adra (Tai)'s procurement is governed by the Contract Procedure Rules and Sustainable Procurement Policy, and by the Scheme of Delegation, which ensure that contracts are awarded in line with the principles of fairness, transparency and equal treatment.

Adra (Tai) have established direct relationships with a number of UK-based suppliers, and we do not have any Tier 1 suppliers from outside the UK. As an organisation, we are committed to supporting local SMEs to engage with procurement processes, and removing the barriers faced by SMEs when bidding for contracts.

Though every tender opportunity, we aim to contribute to the development of the local economy and maximise community regeneration. We actively engage our suppliers and supply chain in community initiatives aimed at creating targeted opportunities for the communities within which we work.

Training

To ensure that all colleagues are fully aware of Adra (Tai)'s zero tolerance position and commitment to ensuring that there is no modern slavery in our supply chains, we provided training to front line staff and senior managers. This training was delivered in association with Unseen UK, Welsh Government and North Wales Police.

Adra (Tai) deliver Safeguarding Training in line with Social Services and Well-being (Wales) Act 2014 which covers key areas such as understanding own role in relation to safeguarding adult, children and young people, understand how to protect, in addition to recognising the types of harm and neglect.

It is a requirement that members of Adra (Tai)'s Procurement Team complete the Chartered Institute of Procurement & Supply (CIPS) training on modern slavery and human rights.

Monitoring Effectiveness

Adra (Tai) understand the importance of assessing the effectiveness of our approach on modern slavery and human trafficking and remain committed to ensuring that modern slavery and human trafficking are not taking place in our supply chains.

We will continually review our policies and procedures to engage with and train staff across the organisation to improve understanding and target areas within our business most at risk.

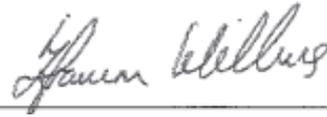
What are our plans for the next 12 months?

Adra (Tai) fully recognises that combating modern slavery and human trafficking requires a coordinated, collaborative and long-term approach. We will continue to review our internal processes and monitor the effectiveness of our actions against modern slavery and human trafficking. Furthermore, we will

continue to work in partnership with external organisations such as North Wales Police and Welsh Government to combat modern slavery and human trafficking in Gwynedd, North Wales and beyond.

Declaration

This statement has been approved by the Adra (Tai) Board of Management and is made pursuant to section 54(1) of the Modern Slavery Act 2015.



Mark Jones
Chair of the Board

Ffrancon Williams
Chief Executive