



**Modern Slavery Statement  
2022-23**

## **Modern Slavery Statement 2022 - 23**

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 took during the financial year April 2022 – March 2023 to minimise the risks of any association with practices that 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 is North Wales' largest housing association, providing over 7,000 homes across the region 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.

We are responsible for the management and maintenance of a varied and diverse housing stock, which includes 400 sheltered units for older and at-risk individuals. We manage many supply chains across the company as we build, manage and maintain our homes to a high standard.

Adra 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 ensures that the highest level of integrity is maintained throughout all areas of our business by promoting our core values:

- **Ambitious**
- **Open & Fair**
- **Trusted**

### **Organisation Structure & Business**

To ensure that we meet our purpose of “supporting our communities and providing quality homes where people feel safe and happy”, it is vital that we are governed effectively for the benefit of our customers. Adra has a Board of Management with a flexible size of between 9 and 12 Board Members. Two Members of the Board are Tenant Board Members and up to two are from the Local Authority. Adra also co-opt extra Members to bring specific additional skills. The Board and Committees oversee Adra's executive management team.

Adra employs over 360 staff, providing over 7,000 homes across North Wales. Most of our homes are for general needs housing, and we also provide sheltered and supported housing.

Adra is registered with and regulated by the Welsh Government, and is also 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 2022 – March 2023, Adra took many 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 undertake to implement the commitments within the Welsh Government's Code of Practice – Ethical Employment in Supply Chains;
- We continue to review and update our procurement processes to ensure that consideration is given to supplier's employment practices.
- Within our tendering processes, Modern Slavery and Ethical Employment is embedded as key considerations, forming part of our selection criteria for inclusion on our contractors register and all major tenders.
- We continue to make prompt payment to our supply chain to help ensure ethical practices continue through every tier of the supply chain.
- We achieved a greater level of transparency in our supply chain by splitting our capital improvement projects into smaller contracts that have been let at a more local level.
- We have implemented a Safeguarding action plan across the organisation to protect vulnerable groups.

## **Policies**

Adra operates the following policies that are relevant to our activity in this area:

- Staff Code of Conduct
- Supplier Code of Conduct
- Code of Conduct for Board Members
- Contract Procedure Rules
- Sustainable Procurement Strategy
- Whistleblowing Policy
- Safeguarding Vulnerable Groups Policy
- Dignity at Work Policy
- Equality & Diversity Policy
- Anti-Fraud, Money Laundering, Bribery, Crime & Information Security Policy
- Health & Safety Policies
- Recruitment & Selection Policy
- Domestic Abuse Policy
- Financial Regulations
- Standing Orders

## **Due diligence and Risk Management**

Adra is 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. Given that we commission construction and refurbishment projects for our properties, we effectively operate in a 'high risk' sector.

Adra has implemented several 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's Approved Contractor Register are asked to sign Adra's Supplier Code of Conduct. This sets out the minimum standards of behaviour and practice expected of our Suppliers and their sub-contractors. 148 suppliers had signed up to our Code by March 2023, a figure that increases year on year.

The tendering of all contracts includes an obligation that suppliers comply with the Act and don't engage in any activity that is contrary to the Modern Slavery Act. The selection criteria continue to 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's Supplier Code of Conduct is included with every new contract opportunity published.

Adra has 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 Supply Chains**

Adra has identified that its supply chain is one of the main areas of risk and exposure to modern slavery. Adra's supply chain is primarily focused on construction, professional services, utilities and facilities management. In 2022-2023, we used in the region of 466 individual suppliers across a wide range of goods, works and services.

Adra's procurement is governed by Adra's internal Contract Procedure Rules and Sustainable Procurement Strategy, and by the Scheme of Delegation. These ensure that contracts are awarded in line with the principles of fairness, transparency, non-discrimination, and equal treatment.

Adra has established direct relationships with several UK-based suppliers, and we do not have any Tier 1 suppliers from outside the UK. Adra is committed to supporting local SMEs to engage with procurement processes, and to removing the barriers faced by SMEs when bidding for contracts.

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

### **Training**

Adra delivers Safeguarding Training which covers key areas such understanding our own role in relation to safeguarding adult, children and young people. The training covers how to recognise the types of harm and neglect as well as how to report concerns.

It is a requirement that members of Adra's Procurement Team complete and continue to refresh their knowledge of the Chartered Institute of Procurement & Supply (CIPS) training on Ethical Procurement practices.

### **Monitoring Effectiveness**

Adra understands the importance of assessing the effectiveness of its approach on modern slavery and human trafficking and of remaining 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 has Adra delivered and implemented?**

An 'Ethical Procurement Champion' from the procurement team was appointed to raise awareness of Modern Slavery throughout the organisation.

Modern Slavery training has been delivered in the organisation to highlight and spot the signs and how to report any concerns.

A communications channel for Modern Slavery was implemented which included useful information and resources and this information was made accessible to all staff.

As an organisation, we are an accredited Real Living Wage employer, ensuring that the Real Living Wage is paid across the organisation, and also within our supply chains wherever possible.

### **What are our plans for the next 12 months?**

Adra fully recognises that combating modern slavery and human trafficking requires a coordinated, collaborative and long-term approach. We will continue to review our procurement strategy and Ethical procurement will continue as a prominent theme.

A new UK procurement bill will come into force in autumn 2024 and Adra's Contract Procedure Rules will be updated to reflect the requirements of the bill. The Procurement team will ensure that appropriate controls will be implemented and incorporated in any future policies & process.

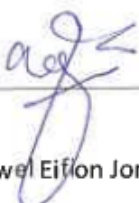
The Procurement team will promote the mechanisms through which suspicions of unlawful and unethical employment practices can be raised.

We will continue to review our internal processes and monitor the effectiveness of our actions against modern slavery and human trafficking. We will attempt to raise awareness of increased transparency in our supply chains to reduce the risk of modern slavery and unethical practices.

The Customer and Communities team will continue to assist our tenants with avoiding ill treatment or being subjected to gangs such as county lines.


### **Declaration**

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



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Hywel Eifion Jones  
Chair of the Board



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Iwan Trefor Jones  
Chief Executive