

Modern Slavery Statement 2017-2018

Background

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 Cartrefi Cymunedol Gwynedd (CCG) have taken during the financial year April 2017 – March 2018 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

CCG is North Wales' largest housing association, providing almost 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.

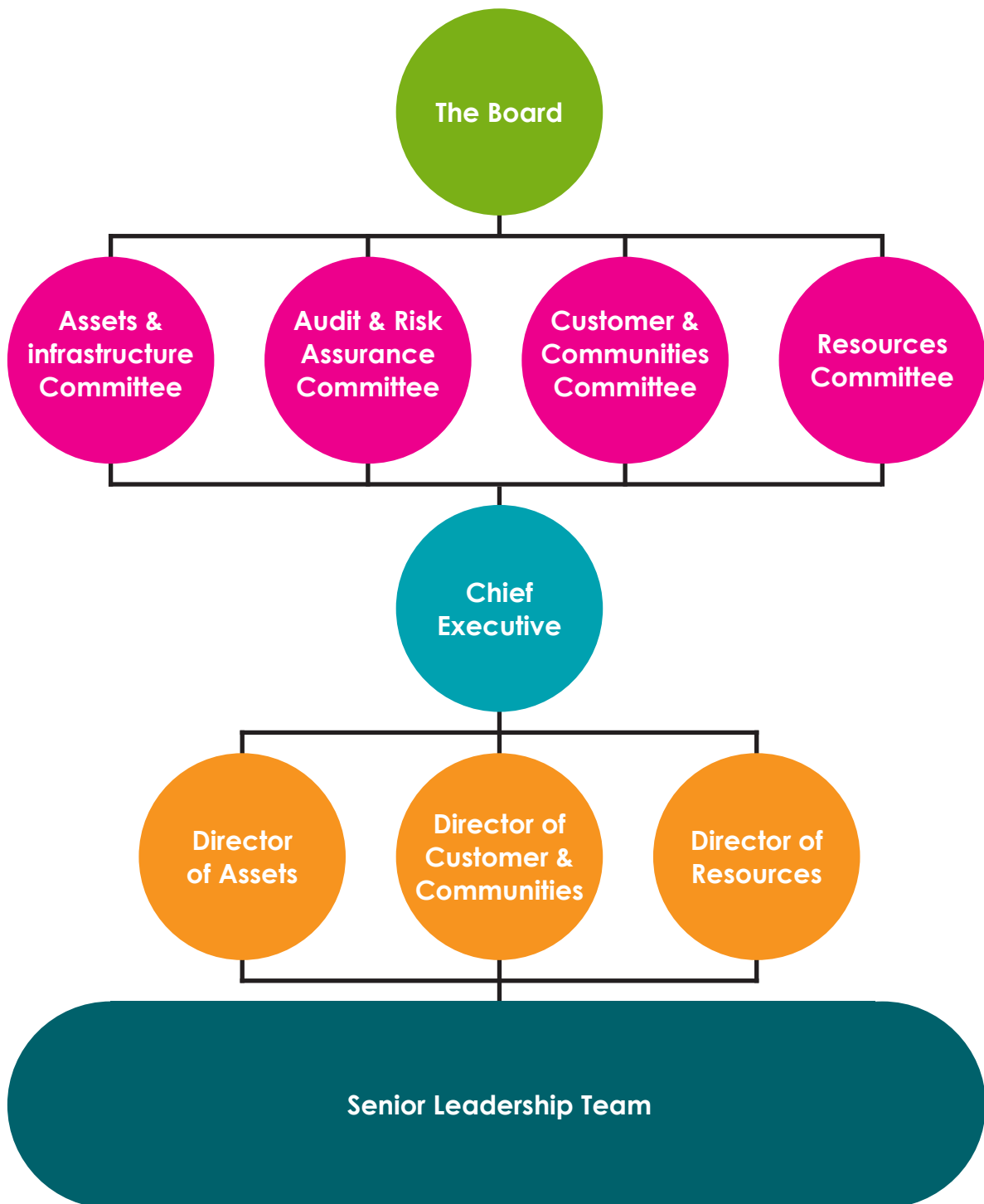
We are responsible for the management and maintenance of a varied and diverse housing stock, which includes 400 sheltered units for older and more vulnerable individuals. We manage a number of supply chains across our business to help build, manage, and maintain our homes to a high standard.

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

- Fair – Make consistent and objective decisions which promote equality and respect diversity
- Accountable – Be effective and take responsibility for the decisions we make and the things we do
- Open – Be honest and transparent in everything we do

- Innovative – Be ambitious and open to new ideas and new ways of working
- Approachable – Be accessible and easy to work with at all times

Organisation Structure and Business



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

CCG employs 274 staff, providing almost 6,300 homes across North Wales. The majority of our stock is general needs housing, but also includes sheltered and supported housing.

CCG 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 2017 – March 2018, CCG 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 were the first Housing Association in Wales to commit to Welsh Government's Code of Practice – Ethical Employment in Supply Chains;
- We have developed an Action Plan which details the activities we will be undertaking to implement each of the commitments within the Code of Practice;
- We have developed our Community Strategy 2018 – 2030, which sets out our community vision and values, priorities and our long-term commitment to making a difference in the communities we serve;
- We have appointed a member of our Executive Leadership Team as an Anti-Slavery and Ethical Employment Champion, demonstrating high level corporate commitment to combatting modern slavery and human trafficking in our supply chains;
- We have reviewed our procurement processes to ensure that consideration is given to supplier's employment practices.

Policies

CCG operates the following policies:

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

Due diligence and Risk Management

CCG 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. Over the next 12 months, we will begin the process of mapping our supply chain in order to assess particular industry / sector and geographical risks. This work is being led by the Procurement Team.

CCG 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 existing contractors on CCG's Approved Contractor Register are asked to provide evidence of compliance with the principles of the Modern Slavery Act 2015 (the Act). Organisations with a turnover of more than £36 million are required to provide a copy of their modern slavery statement.

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.

CCG 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.

CCG Supply Chains

CCG have identified their supply chain as one of the main areas of risk and exposure to modern slavery. CCG's Supply Chain is primarily focussed around construction, professional services, utilities and facilities management. In 2017-2018, we used around 400 individual suppliers across a wide range of goods, works and services.

CCG's procurement is governed by the Contract Procedure Rules, and by the Scheme of Delegation, both of which ensure that contracts are awarded in line with the principles of fairness, transparency and equal treatment.

CCG 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 CCG's zero tolerance position and commitment to ensuring that there is no modern slavery in our supply chains, we will provide training to relevant members of staff. This training will be delivered in

association with Unseen UK, Welsh Government and North Wales Police.

CCG deliver Safeguarding Training in line with Social Services and Well-being (Wales) Act 2014 which covers key areas such 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 CCG's Procurement Team complete the Chartered Institute of Procurement and Supply (CIPS) training on modern slavery and human rights.

Monitoring Effectiveness

CCG 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.

Whilst we have not implemented any specific KPIs or mechanisms to monitor our effectiveness at combating modern slavery and human trafficking, a wider range of performance indicators will be considered and developed in the future, which may include:

- Number / % of suppliers who have signed up to our Supplier Code of Conduct;
- Number / % of suppliers who have signed up to Welsh Government's Code of Practice – Ethical Employment in Supply Chains;
- Number of reported concerns of slavery (including if there were none);
- Internal training to improve awareness amongst the senior and operational management teams, and Employees knowledge of Modern Slavery spotting the signs and how to report.

What are our plans for the next 12 months?

CCG 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.

We have committed to completing the remaining actions on the Action Plan by March 2019. Furthermore, the Action Plan may be expanded with additional actions throughout the year. Such actions may include:

- Undertaking a risk assessment of our supply chain, which will include the identification and assessment of those areas of the supply chain that represent the greatest risk in respect of modern slavery;
- Developing a Supplier Code of Conduct which sets out key requirements for our suppliers including, amongst other things, the mitigation of risks associated with modern slavery and human trafficking;
- Encouraging and facilitating local SME's to sign up to Welsh Government's Code of Practice – Ethical Employment in Supply Chains;
- Developing a set of appropriate performance indicators to measure the effectiveness of our actions;
- Reviewing and updating our existing processes and policies.

Declaration

This statement has been approved by the CCG 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