



Paragon Asra

**PA** Housing

# Modern Slavery Act Statement 2019-20

# Modern Slavery Statement 2019-20



## Introduction

Slavery, servitude, forced labour and human trafficking (modern slavery) are all issues of great global concern given the rise in migration. It exists in every region and economy despite their level of development and affects all organisations regardless of the sectors in which they operate. Modern slavery is unacceptable within Paragon Asra Housing Limited (PA Housing) and its supply chains and tackling it is an important element in our overall approach to business and human rights. PA Housing is committed to ensuring that we implement the requirements of the Modern Slavery Act 2015 and take reasonable steps to ensure that slavery and human trafficking do not exist at PA Housing or in any part of our supply chains. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. We are committed to respecting, protecting and championing the human rights of all those who come into contact with our operations whether they be, residents, employees, supply chain workers or members of the local community. We accept our responsibility to support transparency and honesty and to work with others to protect the rights of individuals, particularly those who are most vulnerable to abuses such as modern slavery. Staff are expected to report concerns, using the appropriate reporting channels, and management are expected to act upon them.

Pursuant to Section 54 of the Act, this statement outlines our approach to minimise the risk of modern slavery in our operations for the year ended 31 March 2020. Our business activities will be assessed annually and our statement will be updated accordingly.

## Organisation structure and supply chains

Paragon Asra Housing Limited is our group parent and is a charitable Community Benefit Society, incorporated under the Co-operative and Community Benefit Societies Act 2014. It is also a registered provider of social housing with the Regulator of Social Housing. We provide housing across the Midlands, London and the South East offering a range of housing solutions from affordable rent and independent living, to shared ownership and outright sale for those in need. We own and manage over 23,000 homes across these regions.

Our modern slavery statement applies to PA Housing and its active subsidiary companies, as follows:

- Asra Construction Services Limited
- Franklands Park Limited (joint venture)
- Paragon Development and Construction Services Limited
- Paragon Treasury plc

All parts of the Group are expected to minimise the risks of slavery and human trafficking in their business supply chains.

## Compliance and Responsibility

Responsibility for compliance with the Modern Slavery Act rests with the Board and compliance responsibility delegated to the Executive Management and Leadership Team.

All departments are responsible for carrying out day to day implementation of policies and procedures that support PA Housing in meeting its responsibilities under the Act.

## Policies and contractual controls in relation to slavery and human trafficking

Our policies and procedures help to detect and prevent modern slavery and human trafficking. They ensure that we are operating in a transparent and ethical manner. A proportion of these are reviewed and approved by PA Housing's Board but many of the operational policies are reviewed and agreed by the Executive Team.

The following policies have been adopted by the business to ensure we fulfil our responsibilities:

**Allocations** - sets out the verification processes we use for all new PA Housing residents. We undertake stringent identity and immigration status verifications as well as income checks. This provides a broad overview of a person's circumstances and can signal where further investigation is warranted if an individual faces an increased risk of modern slavery.

**Equality and Diversity** - sets out our commitment to "...increase awareness of diversity-related safeguarding issues including extremism and radicalisation, child grooming, child sex exploitation and modern day slavery." We check that all suppliers have an equality and diversity policy in place and suppliers who do not meet the criteria to have one implemented are required to agree to PA Housing's policy before they can be approved as a supplier.

**Procurement** - Our Procurement policy outlines our commitment to ensuring that all procurement activity is carried out fairly, transparently and ethically, in accordance with relevant legislation including the Modern Slavery Act 2015. Its procedures set out the controls and checks that we will undertake which are designed to help us verify that suppliers have the necessary safeguards in place.

We ensure that suppliers are committed to making sure that slavery and human trafficking is not taking place within their own supply chain by having appropriate procedures and checks and balances in place to safeguard against all elements of modern slavery.

**Recruitment and selection** - We operate a rigorous recruitment policy which includes candidates having to undergo relevant pre-employment checks before appointment to ensure they are eligible to work in the UK. Roles which have regular contact with children, young people or vulnerable adults, are subject to a Disclosure and Barring Service (DBS) check.

**Safeguarding** - highlights the potential risks of modern slavery and human trafficking including how to identify the signs of exploitation and outlines the practical steps employees are expected to take when they have any protection concerns regarding our customers.

**Whistleblowing** - sets out our commitment to the highest standards of openness, probity and accountability. PA Housing subscribes to a secure, confidential hotline, 'Speak Up' for employees to report any concerns in relation to our work, including the abuse or neglect of vulnerable people and any concerns they may have regarding practices within our supply chain and business.

As part of our policy review cycle, we have considered the need for a standalone Modern Slavery Policy and are now in the process of developing one to strengthen our existing policies to help prevent modern slavery and human trafficking.

We also engage in campaigns and initiatives to raise awareness and help staff identify possible signs of trafficking and forced labour and report their concerns.

The Executive Team will take responsibility for implementing this statement and its objectives. It will ensure that adequate resources are in place to ensure compliance with the requirements of the Act.

## Training on modern slavery and trafficking

All employees undergo safeguarding training which incorporates elements of modern slavery. Our safeguarding training is designed to highlight the risk factors associated with vulnerable individuals at risk of modern slavery and abuse as well as indications of exploitation and how to seek guidance and assistance in helping those at risk. Specifically, this involves:

- All employees being required to complete online safeguarding training upon appointment, which is refreshed every three years;
- Running more detailed sessions for front line colleagues to enhance their safeguarding knowledge;
- Holding performance workshops for all managers and senior leaders and half day Mental Health First Aid workshops;
- Providing training for relevant staff in relation to HR matters such as recruitment, performance and wellbeing.

All new employees attend induction sessions which include information and training on PA Housing's policies. All new and existing employees will receive specific training on modern slavery and human trafficking in order to help identify it and take appropriate action, where they may have concerns.

## Due diligence processes

We understand that our greatest exposure to modern slavery exists within our supply chains. We procure goods and services across a wide range of suppliers, some of which have long and complex supply chains, so we have a Procurement policy which is based on ethical principles.

We encourage partner organisations to apply similar principles to their organisations and supply chains.

We are currently enhancing our due diligence processes by:

- Updating our supplier application form and contract documentation to ensure that our supply chains are mitigating the risks of modern slavery and human trafficking;
- Updating our Contractor Code of Conduct in order to strengthen assurance that our suppliers are engaging in ethical conduct and ensure they are taking appropriate steps to ensure that there is no slavery or human trafficking in their supply chains;
- Updating training sessions for staff working in supply chain management and procurement.

## Risk assessment and management

PA Housing assesses and manages risk in accordance with the Risk Management & Assurance Framework and Risk Management Policy, therein. The Audit and Risk Committee is responsible for providing oversight of the audit and risk activities of the organisation and providing assurance to the Board that it is discharging its responsibilities in this regard.

The internal audit function provides objective assurance to the Committee and the Board that all aspects of the organisations' operations are effective and compliant with legislative and regulatory requirements. The 2019-20 internal audit plan evaluated the internal controls in relation to PA Housing's allocation verification processes, procurement, responses to reports of anti-social behaviour and partnership working – key elements of our modern slavery prevention.

Our supply chain consists mainly of services and supplies for our planned maintenance programmes, with the highest risk areas being associated with our building and maintenance activity. We do not have any supply chains outside the United Kingdom which reduces our risk of exposure to modern slavery. We operate a centralised supply chain using a 'purchase to pay' system which requires the use of pre-approved suppliers. This means that there are more rigorous controls in place prior to committing to expenditure and improved visibility for retrospective checks on expenditure.

The Board does not consider that the organisation's activities are at high risk of slavery or human trafficking and has taken the appropriate steps to manage the level of risk posed but will keep this matter under regular review and amend our internal audit plan, accordingly.

## Measuring effectiveness

Measuring and monitoring effectiveness of our policies and practices will primarily be through internal audit and updating our due diligence processes. Employees are consulted when policies are created or reviewed to ensure that the principles and procedures therein, remain fit for purpose.

As part of employee performance reviews, managers are required to confirm that mandatory safeguarding training has been completed and review the need for further training, specific to the role.

## Statement

There were no instances of modern slavery or human trafficking or concerns identified within the business or the supply chain during the financial year.

This statement was approved by the Paragon Asra Housing Board on 23 July 2020, signed by the Chair of the Board, Hattie Llewelyn-Davies.

