

## Modern Slavery and Human Trafficking Statement

As required by the Modern Slavery Act 2015 (the Act), the following statement outlines what action Clanmil has taken to prevent modern slavery and human trafficking from arising in our business or supply chains.

This statement has been approved by the Audit and Risk Committee by the delegated authority of the Board of Directors of Clanmil Housing on 21<sup>st</sup> February 2022

A new statement will be published each year on the Clanmil website at <https://www.clanmil.org/>

### Organisational Structure

Regulated by the Department for Communities, Clanmil Housing Group is one of Northern Ireland's leading housing providers. Our mission is to provide great homes that strengthen communities with services that matter.

With an annual turnover of £41 million ( Year ending 2021 ), we currently own and manage circa 5,500 homes throughout Northern Ireland including:-

- housing for families and single people
- housing for active older people
- independent living housing for older people who require some support
- housing with care for frail older people
- specialised housing and support for older people with dementia
- specialised housing and support for people with mental health problems
- hostels providing temporary refuge for women and their children suffering abuse within the home

### Modern Slavery statement

As a landlord with a strong sense of social purpose, we are driven by our long history of acting ethically and with integrity in all our business relationships.

Our work is focused on the welfare of our customers, and we work with multiple agencies to identify and support vulnerable residents. We also aim to be a great place to work for all our colleagues.

We are committed to tackling modern slavery and human trafficking in our business and supply chains, particularly in areas of operation which pose a higher risk, such as construction, maintenance, and cleaning services. We have a number of supply chains across our business to help build, manage, and maintain our homes and we require our suppliers and contractors to comply with the Act in order to work with us.

### Policies and Procedures

Our policies and procedures help identify cases of modern slavery and human trafficking in our supply-chain, our business and our communities. Our current approach includes:

### Safeguarding

Our safeguarding policy and procedures provide measures to identify abuse or neglect, including modern slavery and human trafficking. These set out how we report incidents and refer cases to the appropriate authorities where required.

### **Tenancy Audit**

During home visits, we check for signs of modern slavery and human trafficking, as well as any other welfare concerns which the tenants or members of their households may have. Where we have concerns, our staff are equipped to investigate and liaise with appropriate agencies and to take any action needed to resolve the issue and offer support in line with our wider safeguarding approach. This may include another visit without notice, legal action and / or referral to appropriate authorities.

### **Subletting**

We thoroughly investigate reports of subletting and take robust action against this. We work closely with local authorities and other statutory agencies to investigate. Our tenancy inductions and agreements outline our zero-tolerance approach to sub-letting, while our approach is set out in our Anti-money laundering, fraud, bribery and corruption policy.

### **Whistleblowing and Code of Conduct**

We support anyone working for us directly, or indirectly through a supplier, who raises any concerns about actual or suspected criminal offences, including modern slavery or human trafficking. Our Whistleblowing Policy and Procedures make it easier for anyone with concerns to provide us with information, with confidence that we will take it seriously and treat it confidentially.

### **Colleagues**

We treat all our colleagues fairly and equally.

- Our robust recruitment processes include verifying each colleague's identity and their right to work in the United Kingdom before they start work with us
- We have created a right to work to ensure all colleagues have the right to work in the UK sure that we source colleagues from specified, reputable employment agencies

### **Training**

We have a comprehensive programme of compliance training for colleagues which explains our Code of Conduct and how to report any behaviour which does not meet our standards. All colleagues receive safeguarding e-learning and additional safeguarding training is delivered annually to our customer-facing colleagues and includes information on how to spot signs of modern slavery and human trafficking when visiting our residents in their homes and on our estates.

### **Procurement**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Clauses prohibiting Human Trafficking and Modern Slavery are written into our key Assets and Development Contracts, which have been communicated to Managers and those procuring services within the association. We have communicated with staff on areas for additional focus and put in place a training plan for responding to Modern Slavery awareness.

The reporting of any concerns of this nature have been written into our revised Whistleblowing Policy which has been issued and published on our website.

Our suppliers are required to comply with relevant legislation and regulation, to follow our policies, and to understand the needs of the vulnerable people we work with.

As part of our Procurement Process, we have:

- Included standardised clauses in all tender documents which are highlighted in at-risk procurements,
- Specific requirements for suppliers tendering for contracts to confirm compliance with Modern Slavery Act
- Included Modern Slavery Statement in all tender packs.
- A centralised and fully maintained contracts register containing all Clanmil's contracts which has allowed us to review and amend terms with suppliers so that they deliver against our requirements
- Processes in place for the continuous review of our development and asset management suppliers (traditionally higher risk areas)
- Continued to review our procurement policy and procedures and our terms with suppliers so that they deliver against our requirements
- Ensured that contractors working on our sites have the correct permits for working in the UK and are appropriately trained for the work they are undertaking
- Updated our terms and conditions to include the right to carry out site visits where appropriate
- Added a greater focus on Social Value within the procurement process
- Increased our efforts to engage with SMEs

### **Improving our approach to Modern Slavery and Human Trafficking**

We intend to

- facilitate a training and awareness session with our key suppliers in at risks contracts to develop a partnership approach to playing a part in eradicating Modern Slavery within their supply chains and highlighting our expectations.
- Review our approach to the employment of agency workers

### **CLOSING**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31st March 2023. This statement was approved by the Group Audit and Risk Committee on the 22<sup>nd</sup> February 2022.

Signed: Carol McTaggart

Group Chief Executive for Clanmil Housing