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# Modern slavery and human trafficking statement

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## Hendre Group

### Modern slavery and human trafficking statement

#### Introduction

Hendre Group (we) present our annual statement pursuant to the provisions of Section 54 of the Modern Slavery Act 2015 (the Act) for the year ending 31 December 2020. This statement is produced on behalf of the Hendre Limited and all subsidiaries.

This annual statement is intended to:

- outline our commitment to modern slavery and human trafficking matters
- set out the measures we have in place to mitigate our modern slavery and human trafficking risks
- outline the actions that we have taken in 2020 to further strengthen our controls and measures.

#### About Hendre Group

Working throughout south Wales, we provide a wide range of housing, support and care services. The services we provide include the provision of high-quality affordable homes and supporting people to maintain their independence and personal well-being in their own homes, supported housing or in a residential care settings.

Our mission is to make lives better and our vision is to improve health, well-being and prosperity in communities by helping to integrate the systems of housing, health, social care and support. We recognise that we work in an area that could be susceptible to the risks of modern slavery and human trafficking, especially as we work with vulnerable groups within society.

#### Commitment

In compliance with the Modern Slavery Act 2015, we are committed to preventing modern slavery and human trafficking in all our activities and ensuring that our supply chains are free from slavery and human trafficking.

#### Responsibilities

The Hendre Board has overall responsibility for this statement and the organisation's response to the Modern Slavery Act 2015. The Executive team are responsible for putting in place the measures that ensure compliance with the legislation and for monitoring compliance.

Line managers are responsible for engaging with their team to implement policies and procedures and ensuring that their teams are aware of the responsibilities and receive appropriate training.

Employees are responsible for carrying out their work in line with the policies and procedures and for applying Hafod's values and behaviours in everything they do.

## **Recruitment and employment**

As a large employer we recognise that we need to be alert to the potential risks of modern slavery and human trafficking in our recruitment and employment practices. To mitigate against these risks the following controls and measures are in place:

- In order to be offered employment with us all applicants go through a robust selection process that includes an interview
- We conduct a number of mandatory checks, in respect of eligibility to work in the UK, as well as safeguarding practices and disclosure checks
- Our checks apply to all appointments whether employment is permanent, temporary or fixed term
- All colleagues are provided with a clear contract of employment, which complies with legislation
- All laws and standards related to wages, benefits, working hours and minimum age are adhered to
- No young persons may be employed below the age of 16
- All new starters are enrolled onto training that will help them understand where they can go for help should they need it.

## **Agency working**

We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers.

## **Policies**

We operate a number of policies and procedures that describe our approach to the identification of modern slavery risks and steps to be taken to prevent modern slavery and human trafficking in its operations. These include:

### **Whistleblowing policy (Raising Concerns at Work policy and procedure)**

We encourage all our colleagues to report any concerns related to the direct activities or the supply chains of our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

Our Raising Concerns at Work policy and procedure is designed to make it easy for colleagues to make disclosures, without fear of retaliation and includes our grievance, safeguarding and whistleblowing policies. Colleagues can raise any concerns confidentially through the policy and/or they can raise concerns directly to our Hendre Board.

## **Employee code of conduct**

Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour in line with our organisational values:

- Working together
- Respect
- Professional
- Learning and improving
- Great service

## **Anti-Bribery and corruption**

Our Modern Slavery and Human Trafficking policy sets out what is expected of colleagues and Board members in relation to guarding against bribery or corruption in the course of their work. The policy sets out our aims, statement and responsibilities and our commitment to prevent modern slavery and human trafficking.

## **Counter fraud and anti-corruption policies**

We have in place various policies relating to counter fraud and anti-corruption which detail the Group's expectation that all individuals employed (as well as external organisations associated in whatever way with the Group) will act with integrity and that Board members and colleagues at all levels will lead by example in these matters.

## **Training**

We provide training through our Learning and Development team to ensure our employees have full awareness of modern slavery and human trafficking, as well as other related policies including safeguarding, raising concerns at work, and equality and diversity. Our modern slavery training includes:

### **Safeguarding level 1**

As part of our training framework all colleagues are expected to complete our Safeguarding Adults level 1 online training. This training enables colleagues to recognise the signs of abuse, how they can help reduce the likelihood of abuse occurring and how to respond to suspected or disclosed abuse. It examines national policies, local systems and Hafod's policies and procedures.

### **Safeguarding level 2**

All of our front line colleagues in Care, Support and Housing complete Safeguarding level 2 training. This training provides learners with a deeper understanding of safeguarding procedures. This includes an overview of the specific responsibilities under the Care Act 2014, and the steps that colleagues can take to minimise the risk of abuse or neglect. The modern slavery content of Safeguarding level 2 was revised and updated in 2020.

### **Safeguarding level 3**

Leaders and managers who are directly responsible for the care of adults complete Safeguarding level 3. This training helps supervisors to provide support to colleagues should issues of safeguarding occur, and also provides an overview of the required safeguarding reporting procedures.

## **Additional learning**

We have a resource library on our learning management system which provides further information should any of our colleagues need any additional information or support with regard to human trafficking, forced labour, servitude and slavery.

As part of our induction training, colleagues also complete e-learning around equality and dignity at work in line with our policies and procedures.

## **Supply chains**

We are committed to ensuring that our suppliers adhere to the highest standards of ethics. They are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

We work with suppliers to ensure that they meet the standards of the code and improve their employees' working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.

As a condition of tendering for our contracts, suppliers who are required to produce a Modern Slavery Statement must evidence this. Those who are not required to hold a Modern Slavery Statement, or those whose Statement we consider insufficient, must agree to utilise this document as a condition of the contract.

### **Supplier/Procurement code of due diligence**

We undertake due diligence when considering taking on new suppliers, and regularly review existing suppliers. Our due diligence and reviews include:

- Mapping the supply chain broadly to assess particular products or geographical risks of modern slavery and human trafficking
- Evaluating the modern slavery and human trafficking risks of each new supplier
- Conducting supplier audits or assessments through the organisation's own colleagues, which have a greater degree of focus on slavery and human trafficking where general risks are identified
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers through and requiring them to implement action plans
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

### **Our ongoing approach**

We ensure that our policies and practices remain up to date. This ensures that we are fully aware of and compliant with the steps we need to take against modern slavery and human trafficking.

## **Actions taken in 2020**

We are always looking at ways in which we can improve our processes and ways of working to further mitigate any risks of modern slavery and human trafficking. In 2020 we carried out the following:

- On a regular basis we use internal audits to check on compliance with policies and procedures, and in our 2020 financial period a procurement audit was undertaken
- Despite additional pressures due to the COVID-19 pandemic we have maintained the standards we have set out to identify and prevent modern slavery and human trafficking
- We have improved the way we communicate with employees, ensuring they have access to the information they need and are able to contact us for support more easily
- We have implemented a new HR and Payroll system that improves the way in which we check and verify changes to personal details such as bank details and addresses.

Our plans for 2021 are as follows:

- Identifying a suitable ethical supplier database, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular
- Identifying and participating in collaborative initiatives focused on human rights in general, and modern slavery and human trafficking in particular
- Implementation of registration with the Ethical Employment in Supply Chains Code of Practice as a mandatory requirement for suppliers
- Further enhancing the checks we have in place with agency suppliers
- Providing improved systems to enable colleagues to raise concerns
- We will continue to develop our HR system for verifying checks on personal data such as eligibility to work and personal details in line with settled status.



**Jas Bains**  
Group Chief Executive  
Hendre Group Limited

Dated: 21 June 2021