

Modern Slavery Statement 2019



Paragon Asra Housing Limited (PA Housing) is committed to ensuring that we comply with 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.

PA Housing is a charitable Community Benefit Society, incorporated under the Co-operative and Community Benefit Societies Act 2014. 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.

It is important that we use ethical business processes in line with our social purpose. We take care to ensure that slavery and human trafficking do not exist at PA Housing or in any part of our supply chains. We have identified that the main risks for PA Housing are not just as an employer but are also in relation to the suppliers we work with.

This statement covers PA Housing and its subsidiary companies, listed below:

- Asra Construction Services Limited
- Paragon Development and Construction Services Limited
- Paragon Treasury plc

Our policies and procedures

We have an extensive framework of policies and procedures which we have continued to update and refresh in the past year. These help to detect and prevent slavery and human trafficking within PA Housing and in our supply chain. The areas covered include the following:

Procurement - outlines our commitment to ensuring that all procurement activity is carried out fairly, transparently and ethically and in accordance with relevant legislation including the Modern Slavery Act 2015.

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.” The equality and diversity policies of our suppliers are checked against our requirements.

Health and safety - PA Housing complies with all health and safety legislation. We expect partner organisations and suppliers to apply the same principles to their organisations and supply chains.

Employment - we are committed to treating our employees fairly and have a full set of employment policies in accordance with relevant legislation, including a policy on agency workers regulations in relation to the use of recruitment agencies. All employees are paid more than the minimum wage and do not work hours in excess of that permitted by law.

Recruitment and selection - successful candidates undergo pre-employment checks and those with regular contact through their work with children, young people or vulnerable adults are subject to a Disclosure and Barring Service (DBS) check.

Housing management - including tenancy management, tenancy fraud, unauthorised sub-letting, and customer insight to understand who lives in our properties.

Safeguarding - outlines the practical steps employees and our contractors are expected to take when they have any protection concerns regarding our customers and their families.

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.

Procurement and supply chains

We procure goods and services across a wide range of suppliers, some of which have long and complex supply chains. We encourage partner organisations to apply similar principles to those in our Procurement policy to their organisations and supply chains.

Going forward, we aim to enhance our due diligence processes by:

- Updating our supplier application requirements and contract documentation to ensure that our supply chains are mitigating the risks of modern slavery and human trafficking;
- Reviewing our Contractor Code of Conduct in order to strengthen assurance that our suppliers are engaging in ethical conduct;
- Providing further training for staff working in supply chain management and procurement;
- Providing awareness training for suppliers.

We will seek to evaluate our due diligence processes on a regular basis. The modern slavery and trafficking risks of suppliers will be reviewed at any contract renewal.

Training on modern slavery and trafficking

We provide training to staff to ensure that they understand the risks of modern slavery and human trafficking in our business and supply chains. This involves:

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

We participate in campaigns and initiatives to raise awareness, (for example, Homeless Link) and help staff identify possible signs of trafficking and forced labour and report their concerns. Awareness training on modern slavery and human trafficking and where it's likely to appear will also be arranged for new and existing employees.

We have had no alerts over the past twelve months, but we recognise the need to be vigilant both at PA Housing and in relation to our suppliers. We will continue to monitor the effectiveness of our policies and practices in relation to slavery and human trafficking and ensure that adequate resources are in place to ensure compliance with the requirements of the Act.

This statement is made under the Modern Slavery Act, Section 54 for the financial year to 31 March 2019. It was approved by the Board on 19 September 2019 and signed by the Chair, Hattie Llewelyn-Davies.