

## **Paragon Asra Housing Limited's Anti-Slavery and Human Trafficking Transparency Statement 2022/23**

### **Introduction**

It continues to be a priority for Paragon Asra Housing Limited (PA Housing) to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery and Human Trafficking Transparency Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. As a business for social purpose PA Housing does not wish to support or deal with any business knowingly involved in slavery or human trafficking in any part of its operations. We are committed to respecting, protecting, and championing the human rights of all those who come in contact with our operations whether they are, residents, employees, supply chain workers or members of the local community.

We are committed to treating those who work for us fairly, as an employer we are committed to paying the Living Wage across England (the rates for the UK and London increase on 1 October each year) and regularly review our terms of employment to ensure they comply with all relevant legislation.

Pursuant to Section 54 of the Modern Slavery Act 2015, this statement outlines our approach to minimise the risk of slavery and human trafficking in our operations for the year ended 31 March 2023. Our business activities will be assessed annually, and our statement will be updated accordingly.

### **Organisation structure and supply chains**

PA Housing 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 for those in need. We own and manage over 23,000 homes across these regions.

Our 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 PA Housing Board with compliance responsibility delegated to the Executive Management, Senior Management Team and the 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 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 necessary safeguards in place.

We ensure that suppliers and contractors bidding as part of significant procurements are also committed to making sure that slavery and human trafficking is not taking place within their own supply chain.

**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.

We have developed a Modern Slavery Policy to strengthen our current framework and we are continuing our review process to strengthen our existing policies to help prevent modern slavery and human trafficking.

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.

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. We participate in various activities during Modern Slavery Week to ensure that our employees have relevant and industry specific information that will help with the fight against modern slavery. PA Housing also works closely with the modern slavery team and the police to ensure we have the necessary tools to identify and address any victims of modern slavery that may reside in our properties.

### **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 have enhanced 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 organisation's operations are effective and compliant with legislative and regulatory requirements.

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. Other than purchasing low level kit for our information and communications technology (ICT) requirements (most commonly from the United States), 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 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 in which PA Housing or a member of its supply chain was directly involved during the financial year.

This statement was approved by the Paragon Asra Housing Board on 23 March 2023, signed by the Chair of the Board, Suki Kalirai. It will be reviewed and updated as necessary on an annual basis.