ClwydAlyn

Together, we will end poverty

ClwydAlyn Modern Slavery Statement

2026

ClwydAlyn.co.uk

ClwydAlyn Housing Limited

72 Ffordd William Morgan,
Parc Busnes Llanelwy,
Llanelwy,Sir Ddinbych,
LL17 0JD

ClwydAlyn Housing Limited

72 Ffordd William Morgan,
St Asaph Business Park, St
Asaph,Denbighshire, LL17
0JD

ClwydAlyn Modern Slavery Statement 2026

Modern slavery can affect anyone. We understand it is a hidden crime with people becoming trapped in modern slavery because they are vulnerable to being tricked and exploited, often as a result of poverty and exclusion.

This statement is made in accordance with the Modern Slavery Act 2015. It provides an update on our work with our supply chain, staff and residents to raise greater awareness of Modern Slavery. It provides a progress update on our action plan along with setting priorities for 2026/2027.

ClwydAlyn is a housing association working across North Wales delivering a wide range of housing management related services in Denbighshire, Flintshire, Conwy, Wrexham, Powys, Gwynedd and the Isle of Anglesey. Our homes and services include social family housing and single person accommodation, supported living accommodation and specialist care services, low-cost home ownership, leasehold management services and intermediate and market rented housing.

ClwydAlyn is committed to preventing modern slavery and human trafficking. We recognise our responsibility to uphold the principles of fairness, equality, and human rights, and we are dedicated to taking proactive steps to identify, address, and mitigate the risks of modern slavery and human trafficking.

Our Colleagues

We treat all our colleagues fairly and ensure our recruitment processes include the verification of identity and the confirmation of eligibility to work in the UK before employment commences.

We monitor rates of pay and protect against any illegal deductions from pay. We pay directly to employees and do not delay or withhold payments without prior notification. We have maintained our commitment to pay the Real Living Wage, we ensure colleagues are able to take frequent breaks and ensure that they do not work excessive hours.

We offer 24-hour support through an employee assistance program to colleagues and their immediate family members, this provides advice and counselling, including legal advice. We recognise the impact adverse childhood experiences can have on people throughout their lives and, in turn, our local communities. Having completed the Trauma Informed training for our key roles, we are measuring the impact of the changes we have made to the way we do things.

We publish our Modern Slavery Statement and voluntarily submitted our Modern-Day Slavery Statement to the new Government registry.

Policy, Training and Awareness

We have effective policies and guidance in place to monitor pay, breaks and working time arrangements which are reported formally through our leadership and governance structures. ClwydAlyn invest in Safeguarding training for all staff, ensuring awareness of vulnerabilities, exploitation risks and appropriate escalation routes.

Whistleblowing

At ClwydAlyn our whistleblowing practices provide a mechanism for identifying and addressing potential instances of modern slavery and human trafficking. The policy encourages colleagues, contractors and members of the public to report concerns, including those related to exploitation, abuse or unethical conduct. We ensure that all reports are investigated thoroughly and are protected under whistleblowing legislation.

Procurement and Supply Chain Management

We work with many suppliers for our wider goods and services; during 2024/2025, we have monitored those supply chains where we believe there is a larger risk of Modern Slavery taking place and where our spending is highest.

As well as the opportunity for delivering efficiency savings we have put in place a coordinated and effective contract/supplier management process to ensure that regular contract KPIs are being delivered and that due diligence, including adherence to the Modern Slavery Act is in place as a standard contract management agenda item.

During 2025/2026, we undertook several procurement activities where all appointed suppliers were required to evidence their understanding of Modern Slavery risks and confirm appropriate policies and controls before contracts were awarded and commenced.

Our updated tender documentation requires potential providers to evidence and provide additional information on their approach to Ethical Employment, Modern Slavery and contract management reporting KPIs will be agreed with each supplier to evidence that they are compliant with the Modern Slavery Act and that they are monitoring their supply chain to ensure compliance. This applies to all tenders irrespective of whether the supplier's annual turnover meets the £36m threshold that requires a statement to be made.

In all procurement and tender activity conducted under the Procurement Act 2023, potential suppliers are required to complete a Procurement Specific Questionnaire (PSQ). Through the PSQ, suppliers must provide assurances relating to Modern Slavery and ethical employment, including:

- Compliance with the Modern Slavery Act and wider labour law
- Proportionate policies and due-diligence controls to manage labour-exploitation risk
- Declarations on exclusion grounds, including any investigations or enforcement action relating to Modern Slavery

The responses to these questions are evaluated and any concerns raised will prompt further

clarification questions to ensure they meet the evaluation criteria. The successful supplier awarded the contract will be asked to respond to these questions and evidence compliance on an annual basis as part of the ongoing contract management process.

Where a supplier is procured via a framework contract, we have collated information to confirm they have adequate policies and processes in place to manage the associated risk of Modern Slavery by asking PSQ questions and evaluating responses.

For any new supplier there are mandatory checks that must be completed before they can be added to our approved suppliers list and onto our finance system. Staff requesting the new supplier set up will also need to complete a form that evidences the supplier has provided evidence of a policy or process regarding Modern Slavery. Where proportionate and appropriate we will ask them to supply a modern slavery statement/or explain reasons for not having a statement as part of the checks.

Looking to the future

We will continue to complete pre-checks during the tender process and with the new supplier set up. Any suppliers who do not comply with the Modern Slavery Act will automatically be excluded from procurements or delivering services.

Contract management training has been delivered and is being rolled out across wider teams, supporting the consistent application of our contract management processes. We will continue to monitor the application of our contract management processes.

Modern Slavery forms a regular reporting KPI within contracts, particularly for key suppliers, and is monitored through ongoing contract management activity, including proportionate spot checks. We will introduce formal reporting on contract management and compliance through our governance structures.

We will continue to monitor pay, breaks and working time and report formally through our governance structures.

Clare Budden

Group Chief Executive

ClwydAlyn.co.uk

Cymdeithas Elusennol Gofrestredig / Charitable Registered Society (Rhif/Number 22360R) Landlord Cymdeithasol Cofrestredig / Registered Social Landlord (Rhif/Number L051) Wedi ei hawdurdodi a'i rheoleiddio gan yr Awdurdod Ymddygiad Ariannol / Authorised and regulated by the Financial Conduct Authority

Byddwn yn trin gohebiaeth a dderbynnir yn y Gymraeg a'r Saesneg yn gyfartal / We will treat correspondence received in English and Welsh on an equal basis