

## **Modern Slavery and Human Trafficking Statement – April 2018 to March 2019**

### **Introduction**

The Government introduced a provision in the Modern Slavery Act 2015 which requires us to produce a statement explaining the steps we have taken to ensure that there is no modern slavery taking place in our own organisation and our supply chains. With regard to the latter, we are not expected to guarantee that our entire supply chains are slavery free but we need to show what steps we have taken to prevent it. Additionally, our obligations under the Act do not extend to the actions of our customers taking place in our properties. This would be treated in the same way as any other tenancy breach and/or criminal activity when brought to our attention.

Modern slavery is a crime that results in an abuse of human rights, constituted in the Modern Slavery Act 2015 by the offences of 'slavery, servitude and forced or compulsory labour' and 'human trafficking'.

### **Definitions**

- Slavery – the offender exercises 'ownership' over the victim and deprives them of their freedom.
- Servitude – the victim is coerced and obliged to provide services and is generally expected to live on the offender's property, with no chance of changing their situation.
- Forced or compulsory labour – where the victim is working or providing a service under threat (of violence or other penalty) and is not doing so voluntarily.
- Human trafficking – the offender arranges or facilitates the travel of another person (adult or child) for the purpose of exploitation. Even though the victim may have agreed to the travel (often believing they will have a better life) and the exploitation has yet to take place, if this was the reason for the travel, then this is an offence.

An example of how modern slavery could be occurring in our supply chains might include the use of forced labour, (adults and/or children) in the supply of cheaper materials, sourced by our contractors, particularly from countries where employment opportunities are limited and where modern forms of slavery are widespread.

Within our own business, it may take the form of employees' rights being denied, for example staff being expected to work outside the provisions of the working time directive and/or obstructing membership of a trade union.

## **Statement**

During the period 1 April 2018 to 30 September 2018, Grand Union Housing Group (GUHG) comprised Aragon Housing Association (AHA), Rockingham Forest Housing (RHA) and South Northants Homes (SNH). On 1 October 2018, following a legal process to unify and amalgamate the Group, the former subsidiaries ceased to exist as separate entities. This statement, therefore, applies to the activities of each of the subsidiaries within the Group for the period 1 April 2018 to 30 September 2018 and to the unified Group with effect from 1 October 2018.

The organisation is absolutely committed to preventing modern slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from modern slavery and human trafficking. This statement sets out GUHG's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no modern slavery or human trafficking in its own business and its supply chains. The financial year end for the Group is 31 March. This statement, therefore, relates to actions and activities during the financial year 1 April 2018 to 31 March 2019 as detailed above.

## **Organisational structure and supply chains**

- This statement covers the activities of Grand Union Housing Group who owns and manages over 12,000 properties across Central Bedfordshire, Northamptonshire, Buckinghamshire and the surrounding areas. In addition to providing social housing for rent, GUHG develops new housing; building approximately 350 homes per year.
- The following is the process by which the company assesses whether or not particular activities are high risk in relation to modern slavery or human trafficking:
  - All contracts are tendered in accordance with our Tender Specification, Standing Orders and Financial Regulations. In order for a contractor to be successful with their tender and join our approved contractor list, they need to fulfil certain criteria. This would include adherence to and adoption of our key policies and this statement.
  - All building and development companies with which we work need to fulfil the same criteria mentioned above, in order to join our approved list.

- All policies, strategies and key documents (e.g. Financial Regulations, Standing Orders) are managed centrally with regular review to ensure they remain relevant, accurate and up to date. The current versions are stored on the company intranet (GUS) and staff are alerted via GUS when a reviewed policy is uploaded.

## **Training**

The topic of modern slavery and human trafficking is covered at staff induction and all staff were notified of changes to our Equality, Diversity and Customer Care policy and invited to take part in an awareness raising event.

## **Relevant policies**

The organisation operates the following policies/processes that set out its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- Tender Specification
- Equality Diversity and Customer Care Policy
- Confidential Reporting Policy

## **Whistleblowing policy**

The organisation's Whistleblowing policy supports staff to report any concerns related to the direct activities, or the supply chains of, the organisation. This policy is designed to make it easy for workers to make disclosures, without fear of retaliation.

## **Code of conduct**

The organisation's code makes clear to employees (including Board members and involved customers) the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when delivering its services.

## **Investigations**

In the event that any cases of, or concerns around, modern slavery or human trafficking are reported, an investigation would be carried out by the head of governance in conjunction with all relevant senior staff.

Modern Slavery Helpline: 0800 0121 700

Gangmasters Licensing Authority Report Problems: 0800 432 0804

General Office Enquiries: 0345 602 5020

## Awareness-raising programme

The organisation has raised awareness of modern slavery issues by running a campaign which included putting up posters across the organisation's premises and posting information on GUS to include a questions and answers task. This included providing information on:

- the basic principles of the Modern Slavery Act 2015
- the measures the Group has in place to prevent modern slavery and human trafficking
- what employees can do to flag up potential modern slavery or human trafficking concerns
- helplines available (detailed above).

## Board approval and monitoring

This statement has been approved by the Group Board and it will be reviewed and updated annually.

**Customer consultation:**

N/A

**Equality impact assessment carried out:** initial screen

**Person responsible for review:**

Head of Governance

**Date of review:**

May 2019

**Ratified by:**

Group Board date 4 June 2019

Signed by Group Chair: Harry Walker

Signature: .....



Date: 4 June 2019