

Modern Slavery and Human Trafficking Statement- April 2022 to March 2023

Introduction

The Government introduced a provision in the Modern Slavery Act 2015 (the Act) 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 or in 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. However, we recognise the role we play in protecting our customers from modern slavery, human trafficking, and other forms of abuse. Our Safeguarding procedure sets out our process for referring a customer, assessing any allegation of a safeguarding concern, liaising with and supporting statutory or voluntary authorities in their investigations, provision of internal support services for victims, and additional protection measures for customers requiring further safeguarding.

Safeguarding referrals are managed and overseen by our Domestic Abuse and Safeguarding team, as well as being monitored quarterly by the Customer Experience Committee and feature as a standing agenda item to be discussed at all operational leadership meetings. Policies, procedures, and cases involving safeguarding are consistently reviewed and updated by the Director of Wellbeing and Safeguarding.

We recognise the unique position our staff have, in identifying and reporting suspicions of safeguarding, modern slavery and human trafficking. In support of this, as expanded further below, all our staff receive mandatory training on safeguarding and specific training on modern slavery and human trafficking, to better inform our staff on the signs someone may need referring for safeguarding. In the last year we have had no reports of modern slavery or human trafficking in our homes.

Definitions

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

- 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 colleagues being expected to work outside the provisions of the UK Working Time Regulations and/or obstructing membership of a trade union.

Statement

Grand Union Housing Group Limited (Grand Union) is absolutely committed to preventing modern slavery and human trafficking in its corporate activities and is endeavouring to ensure that its supply chains are free from modern slavery and human trafficking.

This statement sets out the actions of Grand Union and its subsidiaries to understand all potential modern slavery risks related to its business, and to put in place steps that are aimed at ensuring, as much as practicable, there is no modern slavery or human trafficking in its own business or its supply chains.

The financial year end for Grand Union is 31 March. This statement, therefore, relates to actions and activities during the financial year 1 April 2022 to 31 March 2023.

Organisational structure

This statement covers the activities of Grand Union which owns and manages over 12,400 properties across Central Bedfordshire, Northamptonshire, Buckinghamshire, and the surrounding areas. In addition to providing social housing for rent, the organisation develops new housing, building approximately 350 homes per year.

Grand Union has three subsidiary companies: Grand Union Group Funding plc, Grand Union Homes Limited and GUHG Development Company Limited. This statement represents the collective action of Grand Union and its subsidiaries.

Supply Chains

The following is the process by which Grand Union assesses whether or not particular activities are high risk in relation to modern slavery or human trafficking:

- All Grand Union goods and services contracts over £25,000 and all works contracts over £50,000 are tendered using Grand Union's electronic procurement system (currently In-Tend). Tenders procured through In-Tend require suppliers to familiarise themselves with this document and when requested provide evidence that they, and all members of their supply chain, are fully compliant with the requirements contained therein.

- Grand Union holds an approved list of suppliers (predominantly for suppliers undertaking works contracts). All new suppliers joining this approved list are required to commit to adopting and adhering to the relevant requirements defined or referred to in this statement.
- Our suppliers and contractors are required to sign an annual declaration as part of their contracts with Grand Union. By the end of the financial year, we will add a requirement for all suppliers and contractors to commit to upholding the requirements of this statement and to take all reasonable measures to ensure there is no modern slavery or human trafficking within their supply chains. This declaration will be reissued annually to remind our suppliers and contractors of their obligations and to capture any updated modern slavery statements, or changes to policies/procedures.
- By the start of Quarter 2 2023/24, we will add an agenda item to our monthly contract meetings specifically relating to human trafficking and modern slavery. This is both an opportunity to discuss and address concerns within our supply chains, and an opportunity to receive reports from our contractors regarding any suspicions of modern slavery or human trafficking in our homes.
- We have a plan in place to reduce the number of suppliers and contractors we use by 60-65% (from approximately 750). In reducing the number of contractors and suppliers, we will reduce our scope of risk with regards to human trafficking and modern slavery in our supply chains. Additionally, this will allow for greater oversight of our contractors and suppliers through an increased capacity to monitor and detect any suspicious activity or concerns in relation to human trafficking and modern slavery.

Training

All colleagues, including Board and Committee members, joining Grand Union are required to complete online training on Safeguarding which includes a section on modern slavery and human trafficking. Additionally, we have introduced mandatory annual online training focused on modern slavery and human trafficking in housing associations.

The training is intended to educate all staff on the indicators that could suggest an individual is a victim of modern slavery or human trafficking. This should give staff the confidence to report any suspicions of human trafficking and modern slavery should they witness any signs while carrying out their duties, or in their daily lives. All reports should be carried out in line with our safeguarding procedure for customers, or if relating to an employee or supplier, to follow the policies set out in this statement.

Since the training was rolled out in April 2023, it has been completed by 92% of our staff and 100% of the Board. This training will be reissued annually to ensure staff are reminded of the signs that an individual may be a victim of modern slavery and human trafficking.

Relevant policies

All policies, strategies, and key documents (e.g. Delegations Framework) 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 colleagues are alerted via GUS when a reviewed policy or strategy is uploaded.

Grand Union operates the following policies 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:

- Procurement Policy
- Equality, Diversity and Customer Care Policy
- Whistleblowing Policy
- Safeguarding from Abuse Policy
- Colleague Domestic Abuse Policy
- Anti-Social Behaviour Policy (which will be amended to include a specific link to this statement)

Employees

Grand Union has a longstanding commitment to be a fair employer and pay all staff at least the national living wage. In autumn 2022 we implemented a market tested pay review for all staff and all staff are now receiving at least market median pay plus 5%.

We are taking steps to ensure that all staff are paid into a bank account in their own name. Where there is cause to make a payment into a bank account not in the colleague's name, we will investigate the individual circumstances justifying those payments.

Whistleblowing policy

Grand Union's whistleblowing policy supports colleagues 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 colleagues to make disclosures, without fear of retaliation. There is a dedicated email address for whistleblowing.

Codes of conduct

Grand Union's codes of conduct make clear to employees, Board/Committee members and involved customers, the actions and behaviour expected of them when representing the organisation. Grand Union strives to maintain the highest standards of colleague conduct and ethical behaviour when delivering its services. Our code of conduct is scheduled for review this year in line with the NHF Code of Conduct 2022.

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 Director of Governance & Risk in conjunction with all relevant senior staff.

If you have any concerns relating to modern slavery or human trafficking, please contact our customer contact team through:

Telephone: 0300 123 5544

Email: help@guhg.co.uk

For Online form submissions: <https://www.guhg.co.uk/contact-us/>

Via Facebook Message: <https://www.facebook.com/GrandUnionHousing/>

Self-referral form: https://www.guhg.co.uk/support/wellbeing_and_support/

External support and advice services

Home Office, Modern Slavery Helpline: 0800 012 1700- www.modernslavery.co.uk

Citizens Advice Bureaux: 0207 833 2181- <https://www.citizensadvice.org.uk/>

Unseen UK, Online reporting: <https://www.modernslaveryhelpline.org/report>

Gangmasters and Labour Abuse Authority helplines: 0800 432 0804

Board approval and monitoring

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

Person responsible for review:	Director of Governance & Risk
Supported by:	Governance and Risk Officer
Approved by:	Group Board 25 July 2023
Date policy reviewed:	June 2023
Date of next review:	July 2024

Signed by Group Chair: Steve Benson

Signature:

Date: 25 July 2023