

Modern Slavery and Human Trafficking Statement – April 2021 to March 2022

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 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 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 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 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 2021 to 31 March 2022.

Organisational structure and supply chains

- This statement covers the activities of Grand Union Housing Group which owns and manages over 12,000 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.
- 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:
 - It is Grand Union's intention that all services and goods contracts over £5,000 and all works contracts over £10,000 are tendered using Grand Union's Electronic Procurement System (currently InTend). Tenders procured through InTend 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.
 - Furthermore, 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.
- 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.

Training

All colleagues joining Grand Union are required to complete online training on Safeguarding which includes a section on modern slavery and human trafficking. As a refresher, a mandatory online training module specifically covering modern slavery and human trafficking will be rolled out to all colleagues this summer. The reason for all colleagues completing the module is to raise awareness of the signs of modern slavery and human trafficking, as these signs may be picked up whilst they are going about their work duties or just their daily lives. The training should enable colleagues to feel comfortable in raising concerns if they see any of the signs highlighted by the training.

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
- Whistleblowing Policy

Whistleblowing policy

The organisation'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.

Codes of conduct

The organisation's codes make clear to employees, Board/Committee members and involved customers, the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of colleague 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 Director of Governance & Risk 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

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
Ratified by:	Group Board 26 July 2022
Date policy reviewed:	15 July 2022
Date of next review:	July 2023

Signed by Group Chair: James Macmillan



Signature:

Date: 26 July 2022