

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

Introduction

Grand Union Housing Group (GUHG) 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. This statement relates to actions and activities during the financial year 1 April 2018 to 31 March 2019.

Organisational structure and supply chains

- This statement covers the activities of GUHG who own and manage approximately 12,000 properties across Central Bedfordshire, Northamptonshire, Buckinghamshire and the surrounding areas. In addition to providing social housing for rent, GUHG is a developing organisation 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 whom 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
- Whistleblowing 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.

Employee code of conduct

The organisation's code makes clear to employees 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 director of corporate services in conjunction with all relevant senior staff.

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 the internal intranet to include a questions and answers task. This included providing information on:

- the basic principles of the Modern Slavery Act 2015
- the measures GUHG has in place to prevent modern slavery and human trafficking
- what employees can do to flag up potential modern slavery or human trafficking concerns.

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Helplines available:

- Modern Slavery Helpline 0800 0121 700
- Gangmasters Licensing Authority to report incidents 0800 432 0804 or general enquiries 0345 602 5020

Board approval and monitoring

This statement was initially 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:

Director of Corporate Services

Date of review:

October 2018

Date of next review:

April 2019