

Modern Slavery and Human Trafficking Statement – April 2023 to March 2024

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 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 Act 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 Housing Group 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 2023 to 31 March 2024.

Organisational structure and supply chains

This statement covers the activities of Grand Union Housing Group which provides over 13,000 homes for more than 29,000 people across Bedfordshire, Buckinghamshire, Northamptonshire and Hertfordshire. In addition to providing social housing for rent, the organisation develops new housing; building 264 new homes in 2023/24 with plans to build 900 more over the next three years.

Grand Union Housing Group 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 the Grand Union Housing Group and its subsidiaries (the Group).

The following is the process by which the Group mitigates activities which are high risk in relation to modern slavery or human trafficking, these focus primarily around our supply chains:

- All the Group's goods and services contracts over £25,000 and all works contracts over £50,000 are tendered using an electronic procurement system (currently InTend). Tenders procured through InTend require suppliers to familiarise themselves with this document, our terms and conditions and Supplier Code of Conduct. When requested they must provide evidence that they, and all members of their supply chain, are fully compliant with our expectations, including the requirement to mitigate the risk of Modern Slavery and Human Trafficking within their supply chains.
- If our suppliers and contractors are required by the legislation to produce a modern slavery statement, they are required to provide us with a copy. All suppliers and contractors, regardless of whether or not they produce their own statement, are required to sign up to and comply with our Modern Slavery statement and our Supplier Code of Conduct. The suppliers who agree to adhere to these conditions may be added to our approved list of suppliers. This provides opportunity to work with local SMEs (small and medium sized enterprises) without reducing the protections against Modern Slavery within our supply chains providing the organisation can evidence their compliance with our expectations.
- Safeguarding, Modern Slavery and Human Trafficking are mandatory discussion points at contractor meetings to ensure organisations are complying with our expectations. This also gives contractors an opportunity to discuss any issues they may have identified while working on our homes.

- We have implemented a new procurement “wave plan” which aims to reduce the 750 suppliers and contractors we currently use by 60-65%. This reduces the scope of risk exposure to Modern Slavery and Human Trafficking within our supply chains. We have finalised stage one of the wave plan which has cleared the procurement backlog and produced a clear timeline of all upcoming procurement allowing us to enter stage two where the planned reductions in contractors and suppliers will be realised.

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, human trafficking and cuckooing. This is in addition to mandatory annual enrolment on a dedicated Modern Slavery and Human Trafficking module. Currently 93.7% of colleagues are up to date with their modern Slavery and Human Trafficking training with Board and Committee members having a 91% completion rate.

We are focusing on training as a priority over the next year to reinforce our dedication to Modern Slavery and Human Trafficking. This will give our colleagues greater awareness and capacity to respond to the broad range of challenging situations our customers may be experiencing and provide our customers with a more complete customer experience.

The primary piece of training we are introducing is mandatory customer service training. We hope to achieve greater attention to and awareness of our customers' personal situations and the situations within their neighbourhoods. Through this training our colleagues will be better equipped to detect and address any issues which may be taking place within our homes and communities. Colleagues are already enrolled for training annually on modern slavery and human trafficking and the signs that someone may be a victim. This new customer service training will enhance the effectiveness of our existing Modern Slavery and Human Trafficking training.

We have also introduced a dedicated procurement training course, through our online training system, Skillgate. This training has been rolled out to all colleagues who engage with procurement as part of their duties or have responsibility for procurement under their management. This training sets out the legal requirements for procurement, Grand Union's processes to procure and a dedicated section on sustainable and ethical sourcing which covers Modern Slavery and Human Trafficking considerations in procurement.

To support the effectiveness of this training we are taking part in compassion fatigue research. The purpose of this research is to study the effects of diminishing compassion for customers because of excessive exposure to extremely challenging situations and supporting individuals in these situations. This fatigue may materialise in difficulty showing empathy to people. This may cause a lack of concern and potential lack of scrutiny which risks instances of Modern Slavery and Human Trafficking going unreported as a result of fatigue. We already utilise the services of a reflective supervisor once every six weeks to support colleagues dealing with difficult customer situations, this research will further bolster our

capacity to and methods of supporting colleagues dealing with these situations. The findings from the research will be used to inform compassion fatigue training and support services for our colleagues. This will should facilitate a consistent and thoughtful approach to customer service regardless of challenging circumstances experienced by any Grand Union colleague. In turn this will increase our chances of successfully identifying instances of Human Trafficking and Modern Slavery through increased attention to customers discussing neighbourhood concerns or through identifying the signs exhibited by a victim. This work will also provide an established support framework for any colleagues who are supporting victims of Human Trafficking or Modern Slavery.

We are also introducing specific face-to-face Safeguarding and Domestic Abuse training delivered by our Safeguarding and Domestic Abuse team or Domestic Abuse responders. All colleagues will receive differing levels of training depending on their role type and if they are customer facing, but all colleagues will receive some face-to-face training as a minimum. This training is intended to build on the basic level of understanding provided by our current Domestic Abuse and Safeguarding mandatory online training modules. Both areas covered by this training suite closely overlap and share indicators of Modern Slavery and Human Trafficking. This training will reinforce the specific training on Modern Slavery and Human Trafficking, encouraging greater numbers of referrals for Domestic Abuse and Safeguarding concerns which will increase our chances to detect any instances of Modern Slavery and Human Trafficking within our homes.

Due diligence for our employees

Building on our market tested pay review for all staff across Grand Union last year, colleagues were given a pay increase of at least 4.5% to ensure we continue to pay at least the national living wage as adjusted for inflation. This is a minimum increase with some departments having received more than this, for example our Internal Repairs team who received a greater rise due to changes in their working practices. Only colleagues with recent disciplinary sanctions, on their notice period, or with a protected salary were omitted from this increase.

All our colleagues are required to provide right to work information for the UK to ensure that everyone working for the Group has the legal right to work, this ensures our immediate staff are not victims of Human Trafficking. We continue to sense check all payments made to our colleagues to ensure that our colleagues are not under financial control by a third party which is one of the main risks of Modern Slavery within the United Kingdom for individuals with right to work status.

The Group'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 Group's codes make clear to colleagues and Board/Committee members, 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. In doing so we have introduced both a new Colleague Code and Board and Committee member Code of Conduct in 2024. These Codes of Conduct are based on the NHF 2022 Code of Conduct.

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

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:

- 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)

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 24 September 2024
Date policy reviewed:	July 2024
Date of next review:	July 2025

Signed by Group Chair: Emma Killick

Signature:



Date: 24 September 2024