Grampian Group Modern Slavery Statement 2024

Introduction

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015, which requires organisations supplying goods or services to publish annually.

The Grampian Group (Grampian) is opposed to all forms of modern slavery and is committed to acting ethically and with integrity in all its business relationships. The statement outlines the steps Grampian takes to ensure that adequate processes and controls are in place to ensure slavery and human trafficking is not taking place anywhere in our supply chains or in any part of its own business.

Structure and Supply Chains

Grampian owns and manages over 3,700 homes across the North East of Scotland. We employ over 120 colleagues, who support the provision of affordable, good quality homes and services to a significant number of customers and households.

Our supply chains cover goods, services and works necessary to:

- Deliver front line services to residents in the properties we manage;
- Build new homes;
- Repair existing homes;
- Support the “back-office” services that keep the business operating efficiently.

This Statement is approved by the Board of Grampian Housing Association and applies to all organisations within the Group:

- TLC Housing Maintenance Limited
- Kirkgate Developments Limited
- Kirkgate Homes Limited (currently dormant)

The Group has adopted a set of values which serve as reference points for how we conduct our business and how we treat all our stakeholders. These values are:

Respect | Integrity | Commitment | Empathy

The Group’s position in respect to modern slavery and playing its part in tackling that is entirely consistent with these values.

This Statement is reviewed and updated annually.

Policy Framework

We have an extensive and robust framework of policies, procedures and contractual requirements in place which contribute to the prevention of slavery and human trafficking. Key policies and strategies include:

Equality Policy

The Association revised its policy in regard to Equality in October 2021 with the assistance of external and specialist support. This combined with a new Action Plan reflects our commitment to social justice and making a positive difference for people.

The equality policy sets out a framework of objectives and specific equality procedures that we use to address discrimination as well as to promote social justice.

The policy objectives are implemented through an equality action plan and a range of other equality procedures. This ensures that we adopt a holistic and systemic approach to equality rights implementation.

This framework provides the foundation on which we will deliver services and take positive action to address inequality and incidence of modern slavery.

Procurement Policy & Strategy

Procurement Selection Questionnaires were revised in 2021 to include questions related to modern slavery and human trafficking to identify and mitigate risk in supply chains. Specifically, all new procurement contracts were revised to ensure that they contain the following clauses:

- The Service Provider shall, and shall use reasonable endeavours to ensure that its employees or agents and/or supply chain shall, at all-time act in a way which is compatible with the Modern Slavery Act 2015.

- Where relevant the Service Provider must publish a statement as required by the Act.

- The Client reserves the right, upon reasonable notice, to audit this at any time during the contract period. In the event that the Client considers that a Service Provider is not in compliance with the Modern Slavery Act 2015 the Service Provider must take all such appropriate remedial actions as requested by the Client to address any areas of concern.

- The Service Provider agrees to indemnify and keep indemnified the Client against all loss, costs, proceedings or damages whatsoever arising out of or in connection with any breach by the Service Provider of its obligations under the Modern Slavery Act 2015.

Grampian will only trade with those who fully comply with this Policy or those who are taking verifiable steps towards compliance. We will assess any suspected instances of non-compliance on a case-by-case basis and take appropriate remedial action.

In 2021, we revised our Procurement Strategy. This incorporated the UK and Scottish legislative framework and follows good practice in procurement.

Recruitment & Selection Policy

Our recruitment and people management systems are designed to ensure that all prospective employees are legally entitled to work in the UK. There are mechanisms in place for colleagues to access support if they are experiencing any type of abuse once in our employment.

We pay all staff at least the Real Living Wage.

Safeguarding Policy

We have a Safeguarding Policy in place to ensure that all suspected cases of neglect or abuse are investigated and reported. The Support Services Manager and ASSIST Support Workers have been designated as Safeguarding Officers and regularly undergo online training about modern slavery. ASSIST also has policies and training for vulnerable adults.

Whistleblowing Policy

Our Whistleblowing Policy provides advice to colleagues and Board Members about how to report any instances of malpractice within our organisation or supply chain.

Lettings Policy

When signing up new tenants we undertake a robust process to ensure that they are who they say they are which includes background and identification checks. Staff will always investigate any allegations from customers or the wider community regarding potential tenancy fraud.

Poverty Strategy

The Poverty Strategy, approved in 2021, links to the Association's online Modern Slavery Statement.

Training

We are committed to raising awareness amongst colleagues about anti-slavery and human trafficking and will included this within training for all colleagues. This topic continues to be a regular feature in our Equality, Diversity and Inclusion plans.

Training is provided via a briefing note and online video available to all staff which highlights the signs of modern slavery and exploitation and how to seek help. Frontline staff who visit tenants and service users are trained to identify signs of exploitation and

understand that instances of this should be reported to managers who would then work with other agencies including social work and Police Scotland to assess such cases.

Practical Delivery

Update on 2023-24 commitments

- **Modern Slavery & Exploitation Helpline** - website links to the helpline site and promotion on social media completed in September 2023.
- **Safeguarding Officers** – filled the vacancy within this role and new online training sourced.

New commitments 2024-2025

We will:

- **Staff training** - reissue the Modern Slavery Guidance internally and ensure training is provided as required for new staff.
- **Suppliers** - write to Grampian's high-value (by Grampian's spend) contractors to confirm our position regarding Modern Slavery and the requirements that we have for our suppliers.
- **Safeguarding Officers** - ensure Safeguarding Officers receive refresher training.
- **Modern Slavery & Exploitation Helpline** – promote the helpline site via website links and social media to via be completed in September 2024.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2024.

Malcolm McNeil
Secretary

27 August 2024