

INTRODUCTION

Grand Union Housing Group (GUHG) comprises Aragon Housing Association (AHA) and South Northants Homes (SNH).

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from 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 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 2016 to 31 March 2017.

ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

- This statement covers the activities of Grand Union Housing Group who owns and manages approximately 11,000 properties across Central Bedfordshire, South Northamptonshire, Buckinghamshire and the surrounding areas. In addition to providing social housing for rent, GUHG is a developing organisation building approximately 160 homes per year.
- The following is the process by which the company assesses whether or not particular activities are high risk in relation to 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 (The Hub) and staff are alerted via The Hub when a reviewed policy is uploaded

TRAINING

The topic of slavery and human trafficking is covered at staff induction and all staff were notified of changes to our Equality, Diversity and Customer Care Policy to raise awareness.

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
- Confidential Reporting Policy

WHISTLEBLOWING POLICY

The organisation's Confidential Reporting 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 slavery or human trafficking are reported, an investigation would be carried out by the Head of Organisational Development in conjunction with all relevant senior staff.

Modern Slavery Helpline 0800 0121 700, Gangmasters Licensing Authority Report Problems: 0800 432 0804 or General Office Enquiries: 0345 602 5020

AWARENESS-RAISING PROGRAMME

The organisation has raised awareness of modern slavery issues by running a campaign which including putting up posters across the organisation's premises and posting information on the hub. This included providing information on:

- the basic principles of the Modern Slavery Act 2015
- the measures the Group has in place to prevent slavery and human trafficking
- what employees can do to flag up potential slavery or human trafficking concerns
- 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 has been approved by the Group Board who will review and update it annually.

Customer Consultation:

Equality Impact Assessment carried out: initial screen

Person responsible for review: Head of Organisational Development

Date of review: April 2016