Slavery and Human Trafficking Statement
About Sanctuary Group

One of the UK’s leading providers of housing, care and commercial services, Sanctuary Group (“the Group”) employs around 11,000 people and manages more than 100,000 units of accommodation throughout England and Scotland. This includes general rented, retirement living, supported housing, student and key worker accommodation and care homes. The Group also provides a range of other services including maintenance, home care and telecare.

As a non-profit distributing organisation, we reinvest our surplus income into our services and business growth rather than distribute it to shareholders. This enables the Group to maintain high standards, develop our services and invest in people and communities.

What we do

Affordable housing
We provide a range of high quality affordable homes and support services across England and Scotland, reflecting the needs and aspirations of our customers and delivering services at a competitive cost. We also provide in-house repairs and maintenance services across our portfolio of properties.

Care
Sanctuary Care is a leading provider of care homes for older people. Our well-trained and experienced staff are committed to keeping kindness at the heart of our care – supporting residents to lead happy, contented lives full of wonderful experiences and memories. With over 65 warm and welcoming homes across England, staff provide a range of personalised long and short-term care including residential, dementia, nursing, intermediate and palliative care.

Commercial services
Our commercial operations provide a range of services including: working with universities and NHS trusts to provide accommodation and facilities management services for students and key workers; managing a portfolio of direct-let student accommodation; managing a portfolio of market rent and commercial properties; providing domiciliary care services to help people remain independent in their own home; and offering telecare support packages for older and vulnerable people.

Development
The Group is building more homes than ever before. We currently have an ambitious 10 year development programme to deliver 24,000 new homes, including through our own in-house construction team. This will include a range of tenures to support more people into home ownership, as well as helping to meet the need for additional rented homes.
Supply Chains
We are committed to achieving greater clarity and understanding of our supply chains in order to seek out and deal with any evidence of slavery and human trafficking.

Sanctuary Group is a UK based operation sourcing goods and services from predominantly UK based suppliers whose supply chains extend globally. We recognise that no supply chain can be considered entirely free from the potential for slavery or human trafficking to occur and we are endeavouring to take further steps to understand high risk areas, communicate our approach and take positive action.

There are a number of due diligence steps currently carried out during our supplier selection process that are designed to mitigate the risk of slavery and human trafficking existing in our supply chains:

Spends over certain thresholds are sourced on a cyclical basis by a central procurement team ensuring selection and award criteria are satisfactorily applied across a number of areas including use of the Crown Commercial Service’s standard pre-qualification questionnaire.

Suppliers who tender for our contracts are required to sign an Equality and Diversity agreement, are asked whether they operate within an ethical code of practice and whether they have a speaking up or whistleblowing policy available to staff.

A full assessment of our supply chains is underway and we acknowledge that a higher level of risk is likely to vest in the procurement of office supplies, building materials, ICT equipment, food and some services’ soft facilities such as catering and cleaning. Strategies for dealing with high risk areas will then be developed and executed.

All central procurement staff will be completing the Chartered Institute of Procurement and Supply’s ‘Ethical Procurement and Supply’ e-learning course in 2016.

Employees
Sanctuary also recognises the potential for slavery and human trafficking to affect employees working within its business.

To ensure its employees are not subject to undue influence and are treated with dignity and respect, Sanctuary has robust HR policies and procedures in place across all its operations. These are regularly audited to ensure compliance with employment legislation and prevent unethical working practices. Sanctuary is committed to ensuring that all staff receive fair remuneration for the job they perform and undertakes regular reviews of terms and conditions across the workplace.
Sanctuary encourages all its employees to report any concerns related to its direct activities or those of its supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Sanctuary’s Whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.

Sanctuary also has robust recruitment processes, which includes verifying the identity of each employee and their right to work in the United Kingdom before commencing employment. All temporary workers are supplied through a specified reputable recruitment agency, which has been subject to thorough due diligence of its practices.

Sanctuary’s employees all have access to a free comprehensive 24 hour employee assistance service offering guidance and counselling in relation to both their work activity and personal life. This service is completely independent from Sanctuary and allows employees to raise concerns in a confidential manner.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group’s slavery and human trafficking statement.

Approved by the Board of Sanctuary Housing Association on 25 May 2016.

Craig Moule
Chief Financial Officer