

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 13,000 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 and telecare.

As a registered provider and exempt charity, we reinvest our surplus income into our services and business growth rather than distributing 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 believe everyone should be able to live in a decent home, where they feel safe and secure. We provide a range of high quality affordable homes and support services across England and Scotland, reflecting the needs and aspirations of our customers. We also provide in-house maintenance services across our portfolio of properties.

Supported living

We deliver personalised care and support to a wide range of vulnerable people. We specialise in services for young people, homeless families and individuals, and people with physical disabilities, learning disabilities or mental health needs. We also provide care in people's homes in our retirement living schemes and telecare services to people in their own homes.

Care

We are a leading provider of care for older people. We have over 100 welcoming homes operated by highly trained staff. We are committed to keeping kindness at the heart of our care. We help our residents live dignified and fulfilling lives in places where they can explore their passions, learn new things and build lasting friendships. Our well-equipped care homes provide a range of long and short-term care and support, including residential, nursing, intermediate, respite, end-of-life, and specialist dementia care.

Student and market rented

We provide a range of commercial services. These include 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, as well as overseeing a diverse portfolio of commercial and market rent properties.

Development

We take our role in meeting the UK's housing shortage seriously and we are building more homes than ever before. Our significant development programme will include homes built by our own in-house construction team. This will comprise a range of tenures to help tackle the housing crisis.

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.

The Group is UK-based, 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 have identified high risk areas, which has informed our communication approach and this enables us to take positive action.

During our supplier selection process a number of due diligence steps are undertaken 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.

Suppliers who tender for our contracts and all new suppliers 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. To enhance our governance of the supply chain we are implementing a Supplier Code of Conduct, which will include our commitment to eliminating slavery and human trafficking from our supply base.

An on-going assessment of our supply chains has been undertaken, acknowledging that there is a higher level of risk in the procurement of construction, workwear, office supplies, building materials, ICT equipment, food and some services such as temporary labour, catering and cleaning. Internal documentation has been updated to include modern slavery in risk assessments undertaken during the tendering process.

We have reviewed our supply chain, identified our high risk suppliers and reviewed their web sites for their published statement. The number of high risk suppliers with a turnover of £36 million with a published statement has increased from 35 to 110 and the number with no statement has reduced from 400 to zero.

Appropriate training is undertaken by staff dealing with suppliers. Specific information is included in courses, as appropriate.

Our standard terms and conditions of purchase and the contract templates include modern slavery clauses.

Employees

The Group 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, the Group 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. The Group 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.

The Group 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. The Group's Whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.

The Group 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.

The Group'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 the Group and allows employees to discuss 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.

This above mentioned approach is applicable across the entire Sanctuary Group. Our approach and strategy is reviewed annually.

Approved by the Board of Sanctuary Housing Association on 22 May 2019.



Ed Lunt
Group Finance Director