

Slavery and Human 2024 Trafficking Statement

Sanctuary
Group

Updated May 2024

Sanctuary Group is a trading name of Sanctuary Housing Association

About Sanctuary

We are Sanctuary. We were set up more than 50 years ago and now provide housing and care in England and Scotland to more than a quarter of a million people. We exist to serve our customers and communities.

Our mission is to build affordable homes and sustainable communities where people choose to live.

We are a not-for-profit housing association, which means we don't make profits for shareholders. Instead we invest all the income we make – every penny – into delivering on our social purpose.

Leading housing and care provider

We own and manage around 125,000 homes. This makes us one of the largest housing associations in the country. Our size, effective governance and careful financial management means we have significant financial strength.

We play our part in tackling the national housing crisis by building good quality affordable homes all over the UK. We build to a wide variety of needs and styles, with the aim of creating or adding to a sustainable community. Our regeneration projects transform communities by listening to residents and putting their needs first.

Social housing is at the core of what we do, and we believe secure, good quality accommodation can be the foundation that enables people to achieve their goals in life.

It's not enough to be financially strong. We believe that to live up to our social purpose, we need to play an active role in the local communities where we work. This means connecting with residents, local authorities, charities and groups so we can work together to create communities that are resilient.

[Read our community investment strategy.](#)

Affordable housing

We provide social and affordable housing across England and Scotland. We let homes through what's called 'choice-based lettings schemes' in some local areas, according to the local authority rules, and directly to tenants in some local authority areas.

New homes

We build new homes around the country for affordable rent, shared ownership and outright sale. Our homes range from flats to large family homes and are at a range of price points.

Enriching lives

We manage more than 110 care homes under Sanctuary Care. We believe in going beyond basic provision of care to enrich people's lives – whether those people are the residents of our care homes themselves, their loved ones or our teams.

Pathways for independence

Supported Living is an important piece of our DNA. We support people on their pathways to independence. Through quality support and housing, we equip people with the confidence, self-esteem and life skills they need to live independently.

Where people choose to live

We've been providing purpose-built student accommodation for over 20 years and we're currently home to over 10,000 students in large university cities across the UK including London, Glasgow, Liverpool, Preston and Manchester.

Keyworker accommodation

We provide accommodation to keyworkers at hospital sites to enable them to complete their practical studies close at hand to their place of work.

Our beliefs

We believe that everyone deserves a good, safe home and a community they can belong to. We believe that everyone should feel included and able to realise their potential. We want to help build a society with opportunities for everyone, regardless of their background or circumstance.

Our values

Our values are ambition, inclusion, integrity, quality and sustainability.



Who we are

Sanctuary has over 14,000 employees who make up one team. From the top of our organisation to the frontline, we are united in working together for our mission.

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 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 the Supplier Code of Conduct. This covers our expectations on supplier behaviour and appropriate policies, including our commitment to eliminating slavery and human trafficking from our supply bases.

Sanctuary is currently amending its standard terms and conditions, supplier on-boarding process, and ordering process to ensure that, in addition to signing up to the Supplier Code of Conduct at on-boarding stage, all suppliers are bound by the Sanctuary Code of Conduct with each individual order. This makes sure that all suppliers are always bound by the most current version of the document.

Sanctuary aims to make greater use of established frameworks, which should ensure that the suppliers used will have already undergone a higher level of due diligence. Guidance and processes have been amended to direct staff to use frameworks, where appropriate, prior to conducting stand-alone tenders.

In 2021 an assessment of our supply chain was 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. All suppliers within the higher risk categories with a turnover of £36 million or over were audited to ensure compliance with the requirement to publish a Modern Slavery Statement. In 2023, two additional organisations were acquired by Sanctuary; Cornwall Care and Swan Housing Association.

This entailed on-boarding a significant number of new suppliers onto Sanctuary systems. A repeat of the 2021 assessment of the supply chain has been undertaken in 2024 following the introduction of these new suppliers.

All procurement employees undertake annual refresher training through the Human Rights module of the Chartered Institute of Purchase and Supply, Ethical Procurement and Supply Course. Specific information on modern slavery and human trafficking is included in a course which is undertaken by all employees.

Through the establishment of strong professional peer networks such as the West Midlands Housing Forum, the Charities Sector Procurement Group, G15 Housing Procurement Leadership Group and Consortium Procurement Round Table, Sanctuary maintains an up-to-date knowledge of best practice within the relevant sectors and from the professional bodies that support these groups such as the Chartered Institute of Purchase and Supply and Crown Commercial Services.

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

Employees

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

To make sure 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 making sure that all employees 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. In respect of temporary workers, Sanctuary has a contract in place with a reputable recruitment agency whose practices have been subject to thorough due diligence.

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 discuss concerns in a confidential manner.

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

This above mentioned approach is applicable across the whole of Sanctuary. Our approach and strategy are reviewed annually.

Approved by the Board of Sanctuary Housing Association on 22 May 2024.

A handwritten signature in black ink, appearing to be 'Ed Lunt', with a long horizontal line extending to the right.

Ed Lunt

Chief Financial Officer