

About The Guinness Partnership

We are one of the largest providers of affordable housing and care in England. We own and manage nearly 65,000 homes, and provide services – including care services – to over 140,000 customers in 165 local authority areas across England.

Our core activities are delivered by more than 3,000 staff and comprise: developing and managing homes for social rent, affordable rent and affordable home ownership; delivering housing and care services for older people; and providing support for customers who might need extra help with issues like managing their money or getting into work. Our social purpose means that any surplus we make is re-invested in new and existing homes and improving our services for the benefit of our customers and their communities.

Our activities are regulated by the Regulator of Social Housing and the Care Quality Commission.

Purpose and scope of this statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (“the Act”) and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2018. It applies to all legal entities that form part of The Guinness Partnership Group.

Our commitment

We are opposed to slavery and human trafficking. We will do what we can to combat such abuses in our business and in our supply chains.

We will act ethically and with the highest standards of integrity, quality, probity, openness and accountability in all our business operations and relationships.

We will develop, implement and enforce processes and controls that seek to ensure slavery and human trafficking is not taking place within our business nor in our supply chains.

We will not knowingly deal with any business involved in slavery or human trafficking.

In our own business

We believe there is a low risk of slavery and human trafficking within our operations. Potential risks are mitigated by our policies and procedures, controls built into our business operations and the knowledge, skills and behaviours of our staff.

Our policies that are relevant to slavery and human trafficking are:

- Anti-bribery and anti-corruption policy
- Anti-fraud policy
- Conflicts of interest policy
- Disciplinary policy
- Diversity and inclusion policy
- Private use of contractors or consultants policy
- Recruitment and selection policy
- Safeguarding adults, children and young people policy
- Staff whistleblowing policy
- Tenancy fraud policy.

Our codes of conduct that are relevant to slavery and human trafficking are:

- Code of conduct for members and staff
- Code of conduct of suppliers and contractors
- Code of governance.

In 2017/18, we reviewed the following policies: conflicts of interest; anti-fraud; staff whistleblowing; and private use of contractors and consultants.

We will continue to review and update relevant policies and procedures so that we take effective and proportionate steps to ensure there is no slavery and human trafficking in our business. We plan to review

the following policies in 2018/19: tenancy fraud; safeguarding adults, children and young people; recruitment and selection; and employee relations.

In our supply chain

Our procurement activities take place in England and our contractors and suppliers are predominantly UK based. We engage with a wide variety of organisations for a broad range of goods and services which are primarily corporate, construction and property related, but also to meet some more specialist requirements.

Some of our suppliers subcontract work or rely on recruitment agencies to supply permanent or temporary staff. Whilst we consider that the risk in our supply chains is low, we recognise that no supply chain can be considered entirely risk-free.

Our robust tendering process ensures we engage with reputable contractors and suppliers who adhere to all appropriate legislation, regulation and practices. Our contract management arrangements help us ensure they maintain the standards required, including the prevention of slavery and human trafficking.

We have required that suppliers are compliant with the Act where a contract has been renewed during the year, or any new contract has been entered into.

We will continue to ensure that our approved suppliers take appropriate steps to comply with the Act and require new suppliers to declare that they are not involved in slavery or human trafficking. In 2019/20, we plan to develop our approach to contract management at Guinness. This will enable us to provide business assurance for a range of compliance related areas, including our commitment to the prevention of slavery and human trafficking.

We have not identified any breaches of the Act during 2017/18. We will continue to be vigilant and where a compliance breach is identified, we will act promptly, involve the appropriate lead agencies and feedback lessons learnt in order to minimise the risk of an incident occurring again.

Training and awareness

We raised awareness of modern slavery and human trafficking through the publication of this statement on the Guinness website.

We may come across slavery and human trafficking in connection with the customers we support. In addition, our homes could be used for modern slavery. We have robust safeguarding procedures in place and we have delivered training to raise awareness of what slavery and human trafficking might look like in our business; and to encourage key customer facing staff to report concerns.

We plan to review the safeguarding procedures in 2018/19 to ensure they remain fit for purpose.

We will continue to raise awareness and deliver training to new and existing staff and we will extend this to our suppliers and contractors, where appropriate.

This statement was approved by the Board. It will be reviewed on an annual basis.

July 2018

Signed 
Neil Braithwaite (Chair)