

# Slavery and Human 2025 Trafficking Statement

Sanctuary  
Group

Updated May 2025

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.

**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 around 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**

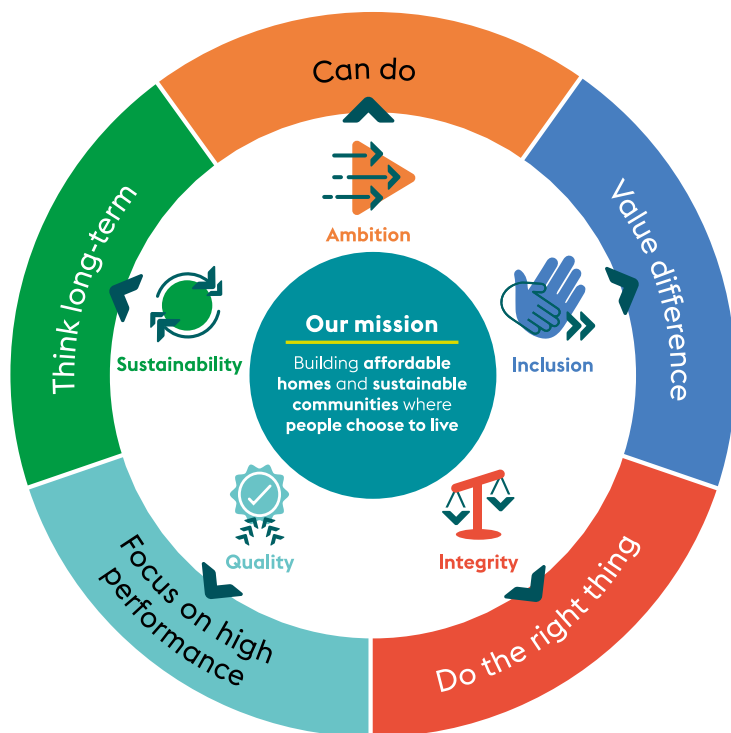
We provide accommodation to keyworkers at hospital sites to enable them to complete their practical studies close at hand to their place of work.

## 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 around 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.

## Customers and safeguarding

Sanctuary is committed to safeguarding the safety, dignity and rights of everyone who engages with our services. As part of our responsibility to protect individuals from harm, we take a robust and proactive approach to preventing and responding to concerns regarding modern slavery, human trafficking, abuse and exploitation.

We have clear safeguarding policies and procedures in place for both children and adults, supported by a dedicated domestic abuse policy. Our staff complete mandatory safeguarding training, which covers modern slavery and human trafficking. This training is regularly updated to reflect changes in legislation and best practice, ensuring our teams are equipped to identify and respond to concerns.

Strategic oversight of safeguarding, including modern slavery, is provided by our Safeguarding Steering Group, chaired by a member of our Executive Committee. This group sets the strategic direction for safeguarding across the organisation, ensuring legal compliance and the integration of national guidance into our practice.

We are committed to creating a safe, inclusive and respectful environment for all, and we continue to review and strengthen our approach to ensure that exploitation has no place in our organisation or the communities we serve.

## 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.

In 2024 Sanctuary amended 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 early 2025, following the integration of Swan Housing Association Limited and “Johnnie” Johnson Housing Association which entailed on-boarding a significant number of new suppliers, 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.

An audit of all suppliers in the at risk categories was undertaken. All those legally required to publish a Slavery and Human Trafficking Statement have done so and this is available on their website.

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, GI5 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.

The Procurement Act 2023, which came into force on 24 February 2025, provides new powers for mandatory and discretionary exclusions of suppliers in tendering activity on specific grounds. This covers the labour market, slavery and human trafficking offenses, encompassing the most serious forms of labour abuse, which are those within the purview of the Director for Labour Market Enforcement, as well as modern slavery and human trafficking offences. It also covers offences relating to the carrying out of an employment agency or employment business, the offence of refusing or wilfully neglecting to pay the national minimum wage and gangmaster offences.

In addition, the Government will be maintaining a published debarment list of suppliers which have committed offences in the above category, which Sanctuary can use to check when tendering and against existing supplier lists. This new transparency should provide greater comfort that suppliers used are free of slavery and human trafficking in their supply chains and in their practices.

## 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 28 May 2025.

A handwritten signature in black ink, appearing to be 'Ed Lunt', written over a horizontal line.

Ed Lunt

**Chief Financial Officer**