



Slavery & Human Trafficking (Modern Slavery Act Transparency) Statement

For the year ending 31 March 2022

Table of Contents

Introduction	02
Our values	03
We are Ambitious	03
We are Creative	03
We are Collaborative	03
Our structure	04
Our supply chains	05
Our policies	07
Training and communication	08
Due diligence, risk assessment and mitigation	10
Effectiveness in ensuring that Slavery and Human Trafficking is not taking place in business or supply chains	12
Priority steps for the next coming year	14

Introduction

Aspire Housing is a leading housing provider, place shaper and property developer. Profits are reinvested in new homes, in revitalising communities and in a comprehensive range of innovative support services, designed to transform lives. Social responsibility and integrity have been embedded across the organisation since it was incorporated in 2000. We have a long-standing commitment to supporting a diverse culture, where equal opportunity is actively promoted and unlawful discrimination is not tolerated.

Section 54 of the Modern Slavery Act 2015 (“the Act”) requires us to provide a slavery and human trafficking statement on a yearly basis, outlining our commitment and actions taken to ensure that slavery and human trafficking is not taking place within the organisation or our supply chains.

This is our seventh statement since the introduction of the Act we are proud to be able to reference several long-standing policies and activities that support the aims of the Act.

We will continue to improve our policies and activities to support our zero-tolerance approach, which to date have ensured that we have had zero reported incidences of slavery or human trafficking.

Our values

We are Ambitious

Through Building Better Futures we encourage our staff to go the extra mile for our customers and communities, remaining vigilant and aware of those who may be experiencing modern slavery.

We are ambitious in our commitment to tackling Modern Slavery within our supply chains, our business and within the communities we serve.

We are Creative

We constantly strive to break down barriers by sharing ideas, knowledge and best practice with other similar organisations and have reviewed other Registered Providers' statements to ensure that we are serving our customers, partners, colleagues and communities in the best way possible.

We are Collaborative

We work together with passion and energy to a common purpose to achieve great things for all, working closely with our supply chain to ensure that they mirror our approach to modern slavery.

Our focus is on building Better Futures through collaboration, partnerships and teamwork.

Our structure

We are a Charitable Community Benefit Society and social regeneration business, providing housing and neighbourhood services in the social housing sector. Our mission is to create successful communities, to enhance lives and maximise opportunity.

We have over 300 employees and operate solely in Staffordshire and Cheshire (UK). Our head office is in Newcastle-under-Lyme, Staffordshire.

We have rigorous Human Resources procedures in place to ensure that all employees have a legal right to work in the UK, are paid a fair and legal wage, and are under no duress.

We have an open accountable culture and if slavery and safeguarding issues emerge, these are reported through standard management processes, the Safeguarding Reporting process or through our Whistleblowing process.

For more information on our current structure visit:

<https://www.aspirehousing.co.uk/who-we-are>

Our supply chains

Aspire and its subsidiaries will not support or deal with any business knowingly involved in slavery or human trafficking.

Our supply chains are largely based in the UK and include a significant proportion of local suppliers who work closely with us and are managed by individual contract managers. We believe that, given that we operate solely in the UK, within the social housing sector, with simple financial transactions and business partnerships, we have a lower risk of exposure to acts of modern slavery.

Examples of our supply chain include cleaning, gas engineering and construction contracts. We recognise that some of these supply chains, for example, the UK cleaning sector is widely held to be one of the most likely places for human traffickers to place their victims. When reviewing these contracts they will be given a medium or high modern slavery risk rating to ensure that we have sight of them and include them within our due diligence activities.

All current suppliers were made aware of the requirements of the Act when they were issued with an updated copy of our revised terms and conditions of purchase in July 2016 which includes a condition that they comply with the Act.

To further strengthen our supply chain controls we have created a checklist of several terms in relation to modern slavery, which we are not willing to compromise on when agreeing to supplier terms and conditions. Within our Supplier Code of Conduct we are incorporating non-negotiable terms,

Our supply chains (cont)

including a requirement that suppliers not using or tolerating any form of slavery, servitude, indentured or compulsory labour or any form of human trafficking. It also states that suppliers must report to Aspire any incidents of slavery or human trafficking found in its business or supply chain.

Our policies

Whilst we do not have a standalone Modern Slavery Policy, we believe that our commitment to equality and fairness is the foundation of all our activities and our policy framework supports the Act's aims to ensure that any potential modern slavery is mitigated against in our business or supply chain, including specifically:

- Aspire Group Equality & Diversity Policy
- Recruitment and Selection Policy
- Aspire Housing Safeguarding Policy
- Aspire Group Anti-Harassment & Bullying Policy
- Aspire Group Whistleblowing Policy
- Violence and Aggression Policy
- Value for Money ("VFM") Strategy - outlines the procurement requirements

We regularly review our terms of employment to ensure that they comply with all relevant legislation.

For further details of these policies please contact governance@aspirehousing.co.uk

Training & communication

To ensure a high level of understanding of the risks of modern slavery and human trafficking we have provided training since 2017 to our new starters and existing staff in our neighbourhood 4 teams. This training raises awareness of how to recognise potential victims of modern slavery and guidance on what to do if slavery is suspected in interactions with customers, suppliers or others.

‘Modern Slavery and Human Trafficking’ training can be accessed by everyone in the organisation at any time to refresh their knowledge as and when required and all neighbourhood team staff are required to undertake refresher training every 3 years; the last mandatory refresher training taking place in 2020.

We also provide safeguarding training to all front-line roles across the organisation which is refreshed every three years. In 2020 all our front-line staff in housing completed ‘Safeguarding Everyone’ training, which is centred around types of abuse, the symptoms that are associated with abuse, and those factors that can make an individual more at risk of abuse. Our Maintenance and Localities teams who provide frontline services to our tenants work closely together to report and investigate if anything ‘seems/feels odd’.

We also offer a range of Equality and Diversity training which is available to new starters and all staff. In late 2020 we added unconscious bias and dignity at work training to our e-learning suite of courses.

Training & communication (cont)

Completion of mandatory training is monitored, and processes are in place to identify and address instances in which staff members have failed to complete.

Due diligence, risk assessment and mitigation

Our primary risk is in association with a delivery partner or associated business, regardless of size, with an ambiguous or non-compliant supply chain. Risk of modern slavery arises from us

- a) procuring goods or services for our own consumption as a business where there is an unethical supply chain,
or
- b) that we engage with or partner with an organisation that has an unethical supply chain.

Using our contracts register, we are in the process of undertaking a risk assessment of our current suppliers and other businesses associated with Aspire to identify high and medium risk contractors. This focuses on business type and size.

We have carried out checks on a sample of our suppliers with a turnover in excess of £36 million per year and reviewed their websites for their published statement. All suppliers were found to be compliant with the Modern Slavery Act requirements.

Of the companies who do not produce an annual MSA statement, due to their turnover being below £36 million, Aspire Housing is considering requesting these contractors produce a statement detailing that it has considered its obligations regarding the suitability of its workforce and its supply chains.

Due diligence, risk assessment and mitigation (cont)

Modern Slavery is included on the Governance risk register for Aspire Housing.

In order to mitigate risks we will include an up-front compliance requirement in our tender and procurement documentation, ensure all suppliers sign contracts in which they promise to adhere to MSA requirements and Aspire reserves the right to terminate contracts if the supplier does not comply. We will also request that all suppliers submit their own modern slavery statement for businesses with a turnover in excess of £36 million per annum. For now, we have carried out our own spot checks to ensure these businesses have published their own Modern Slavery statement and are therefore compliant with the Modern Slavery Act.

Effectiveness in ensuring that Slavery and Human Trafficking is not taking place in business or supply chains

During this reporting period Aspire Housing have not identified nor have we been made aware of any instances of Modern Slavery taking place within the scope of our business activities or supply chain.

We have reviewed our whistleblowing policy and communicated it widely so employees are aware of what they can do if they suspect modern slavery is taking place.

In 2023, we plan to communicate with all staff via our company bulletin to raise awareness of the new requirements of the Modern Slavery Act, direct staff to Modern Slavery training and provide information on Modern Slavery resources.

We will:

- Continue to be vigilant when assessing areas of potential risk within our business and supply chain
- Perform checks on high-risk contracts to ensure they are compliant, once identified.
- Act promptly where a compliance breach has been identified or flagged

Effectiveness in ensuring that Slavery and Human Trafficking is not taking place in business or supply chains (cont)

- Increase awareness with third parties we engage with by promoting and signposting industry led on-line guidance and compliance tool kits, as supplied by CIOB, RICS and others.

Priority steps for the next coming year

- This statement, once published, will be shared with all staff, along with details of resources including the Modern Slavery Helpline (<https://www.modernslaveryhelpline.org/> or 0800 0121 700) and the Stronger Together initiative (www.stronger2gether.org).
- The following policies will be reviewed and updated in accordance with the following timelines:
Aspire Group Equality & Diversity Policy (March 2023)
- A new Supplier Code of Conduct will be implemented to encompass modern slavery, equality, diversity and inclusion (EDI) and an environmental focus. This will be sent out retrospectively to all existing contracts and will be used as part of the procurement process for all future contracts.
- Aspire Housing's Modern Slavery statement 2022 will be published externally as one of our ethical policies on our website. We will also publish the document on the Modern Slavery Registry.
- Aspire Housing will raise awareness of the content of our published statement by notifying organisations in our Frameworks, Delivery Partnerships and other companies with which we regularly engage.
- Once our new contracts management software is in place we will undertake a risk assessment of our current suppliers and other businesses associated with Aspire to identify high and medium risk contractors. This will be focused on business type and size. Risk scores will be generated for each contract to allow us to identify where we would need to perform audits and spot-checks. A summary report of our risk categorisation will be reported to our Executive management team bi-annually.

Priority steps for the next coming year (cont)

- We are looking to introduce the ability to perform audits where required on higher risk contracts to ensure they have the correct checks and balances within their recruitment systems, such as eligibility to work in the UK and Disclosure and Barring Service (DBS).
- We will deliver procurement training to all relevant staff within the organisation with a focus on Modern Slavery to enable staff to identify Modern Slavery risks within the procurement process.
- We will review our processes for procurement, contract management, ordering and payments and all other related documentation to include a greater focus on the requirements of the Modern Slavery Statement and our commitments in this area.

This statement will be reviewed and updated on an annual basis and is approved by Aspire Housing's Board.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended 31 March 2022.

Aman Dalvi



On behalf of the Aspire Housing Board



**Aspire Housing, Kingsley, The Brampton,
Newcastle-under-Lyme, Staffordshire, ST5 0QW**

01782 635200 | www.aspirehousing.co.uk

