



Slavery & Human Trafficking (Modern Slavery Act Transparency) Statement

For the year ending 31 March 2024

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Introduction

Aspire Housing is a leading housing provider, a place shaper (as an organisation deeply rooted in the neighbourhoods where we manage homes) and a 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.

We put people first by delivering safe, decent homes and excellent housing services through our talented Aspire team.

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 eighth 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 champion the customer

Because we...

- Act on the customer's voice and walk side by side in their journey
- Take responsibility for actions and mistakes and put things right
- Do the right thing and keep our promises

We build togetherness

Because we...

- Create a work community and one-team approach
- Value all of our colleagues and the contribution they make
- Value the diversity of our communities, striving to ensure our services meet their needs

We are professional

Because we...

- Role model professional behaviours, being accountable and taking responsibility
- Show respect and empathy for others
- Demonstrate transparency and honesty in decision making

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 circa 400 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. A review will be undertaken of all contracts within our contracts register and each contracted supplier will be assigned 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

Our supply chains (cont)

Code of Conduct, issued to all suppliers in 2023, we have incorporated non-negotiable terms, including a requirement that suppliers do not use or tolerate any form of slavery, servitude, indentured or compulsory labour or any form of human trafficking. It also states that suppliers must immediately report to Aspire any incidents of slavery or human trafficking found in its business or supply chain. Further actions related to the Supplier Code of Conduct will be progressed as part of next steps for the following year.

Aspire is committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers comply with all applicable anti-slavery and human trafficking laws including, but not limited to, the Modern Slavery Act 2015. We expect them to require the same standards of their own sub-contractors, suppliers and business partners. Suppliers will not use or tolerate in their supply chain any form of slavery, servitude, indentured or compulsory labour or any form of human trafficking. All work must be conducted voluntarily and without threat of any penalty or sanctions. It is their responsibility to ensure that any of their sub-contractors also comply with the above requirements. Suppliers are required to report to Aspire any incidents of slavery or human trafficking found in its business or supply chain immediately, in writing.

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:

- Equality Diversity & Inclusion Policy (last updated June 2023)
- Recruitment and Selection Policy (last updated May 2023)
- Safeguarding Policy (last updated May 2023)
- Anti-Harassment & Bullying Policy & Procedure (last Updated October 2022)
- Whistleblowing Policy (last updated April 2024)
- Violence and Aggression Policy (last updated October 2022)
- Value for Money "VFM" Strategy (outlines procurement requirements) (last updated March 2024)

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

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 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 colleagues are required to undertake refresher training every three years. We provide safeguarding training to all front-line roles across the organisation which is refreshed every three years. We also offer a range of Equality, Diversity and Inclusion training which is available to all colleagues.

In early 2024, every contract manager within the organisation received contract management training with a focus on Modern Slavery to enable colleagues to identify Modern Slavery risks within the procurement and contract management processes.

In 2024 we reviewed and refreshed all the above training and will be releasing new content that will be available for all colleagues. Completion of mandatory training is monitored, and processes are in place to identify and address instances in which colleagues have failed to complete.

In 2023, we added safeguarding as a new section within the Supplier

Training & communication (cont)

Code of Conduct. We are also requesting that suppliers carry out due diligence checks. Aspire is committed to safeguarding the welfare of children, young people and vulnerable adults. Suppliers have a dual role to play in this; appropriate due diligence on relevant workers and reporting of safeguarding concerns that are identified whilst working on behalf of Aspire. Aspire has a designated safeguarding lead.

In March 2023, we established the Equality, Diversity & Inclusion Forum (EDIF) which has responsibility for ensuring the development and delivery of Aspire's EDI agenda and has completed the following key tasks since its creation:

- Forum group established with representation from across the business.
- Creation of dedicated EDI Intranet Page containing resources, information and guidance for colleagues.
- Review and update of the EDI Policy.
- Review and update of the EDI Strategy in line with the updated EDI policy and actions reviewed to reflect corporate structure and business priorities.
- Several externally facilitated EDI training sessions delivered to EDIF members, Executive Team and Board and, Leadership Team (Heads of Service and Directors).
- Colleague training developed – including toolbox talks for our maintenance operatives, refreshed e-learning, EDI training built into complaints handler training, EDI Forum members delivering training to every team meeting.
- A key action for the EDI forum will be to oversee the completion of Equality Impact Assessments (EIAs); an evidence-based

Training & communication (cont)

approach designed to help organisations ensure that their policies, practices, events and decision-making processes are fair and do not present barriers to participation or disadvantage any protected groups from participation. This covers both strategic and operational activities.

A new EDI mandatory training package is currently being designed and will be made mandatory for all new starters.

All Executive and Board and Committee members have received EDI and Unconscious Bias training in May 2023. All Directors and Heads of Service have received the training in July 2023. This training will be delivered again in August 2024 for all new Heads of Service, Directors, stage 2 complaints handlers and Board members.

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) engaging with or partnering with an organisation that has an unethical supply chain.

Using our newly procured contracts management software, In-tend, we have categorised every contracted supplier to enable us to identify higher risk suppliers based on contract value and service area within which they operate.

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 to 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)

“Failure to comply with legal or regulatory requirements” is a risk listed within Aspire’s Risk Register, which incorporates Modern Slavery. Safeguarding is listed within Aspire’s Health and Safety Risk Register.

In order to mitigate risks we will publish our Supplier Code of Conduct to our website, and require all contracted and non-contracted suppliers to comply with the requirements of the Code when conducting business with us. Aspire reserves the right to terminate contracts if the supplier does not comply.

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 that employees are aware of what they can do if they suspect modern slavery is taking place.

In 2024, we have communicated with all colleagues via an all-colleague email to raise awareness of the Modern Slavery Act, direct colleagues to Modern Slavery training and provide information on Modern Slavery resources. We have also updated the Modern Slavery page on our intranet to provide a wealth of information and resources in this area for our colleagues.

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

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.
- 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 colleagues, 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).
- Our Supplier Code of Conduct has been provided to all existing contracted suppliers and will be used as part of the procurement process for all future contracts. We will also require suppliers that do not operate under a contract to comply with the requirements of our Supplier Code of Conduct as part of the invoice payment process.
- Regular contract management meetings will be held with all contracted suppliers, supported by the Procurement team for all strategic contracts, which will provide an opportunity to discuss any support requirements around Modern Slavery, Safeguarding etc.
- A consolidated toolkit will be created for contract management which will include guidance, templates, agendas and required frequency of meetings for all contract managers dependent upon the nature and risk of the contract to Aspire. Modern Slavery requirements will form part of the annual checks carried out by contract managers.
- Aspire Housing's Modern Slavery statement 2024 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.

Priority steps for the next coming year (cont)

- Aspire will carry out further risk assessment of the supplier categorisation on the In-tend contracts management system to determine the top 10 suppliers most at risk of modern slavery and undertake an audit on them.
- As part of the audit, the suppliers identified as most at risk will be asked to provide evidence of their Modern Slavery Statement and if they do not have one, they will be supported to create a modern slavery statement and provided with link to Aspire's Modern Slavery Statement as a template. Aspire will also discuss any training that the supplier delivers to its staff in this area.
- A review of our processes for procurement, contract management, ordering and payments is underway. We will continue to review all other related documentation to include a greater focus on the requirements of the Modern Slavery Statement and our commitments in this area.
- We will create a support package for all new suppliers which will be shared and publicised via our website to include useful information for new suppliers as well as requirements relating to health and safety, data protection, information security, safeguarding, equality, diversity and inclusion, insurance requirements and modern slavery.
- We will look to expand our current Modern Slavery training programme to all front-line colleagues and any other specific roles identified as requiring this training, such as contract managers.

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 2024.

Aman Dalvi

A handwritten signature in black ink, appearing to read 'A Dalvi', is centered within a light gray rectangular box.

On behalf of the Aspire Housing Board

23rd July 2024



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

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