

ASPIRE HOUSING LIMITED

Slavery & Human Trafficking Statement/ Modern Slavery Act Transparency Statement

For the year ended 31 March 2018

Introduction

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 promoted actively and in which unlawful discrimination is not tolerated.

The new Modern Slavery Act 2015 requires us to provide a statement, outlining our commitment and actions taken to ensure that slavery and human trafficking is not taking place in our supply chains, or within the organisation.

This is our third statement since the Act was introduced and 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 we have had no reported incidences of slavery or human trafficking.

Our structure

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

We have over 400 employees and operate solely in Staffordshire & Cheshire (UK). Our head office is in Newcastle-under-Lyme, Staffordshire.

For more information on our current structure visit:<https://weareaspire.org/>.

Our supply chains

Our supply chains are solely 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 low risk of exposure to acts of modern slavery.

All current suppliers were made aware of the Modern Slavery Act requirements when they were issued with an updated copy of our revised terms and conditions of purchase in July 2016. These include a condition that they comply with the Act. Terms and conditions are provided to all new suppliers for them to sign prior to any purchases being made.

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 of our activities and our policy framework supports the Act's aims to ensure there is no modern slavery in our business or supply chain, including specifically:

- Aspire Group Procurement Strategy (2014-2019), including our supplier Pre-Qualification Questionnaire and supplier Terms & Conditions
- Aspire Group Equality & Diversity Policy
- Aspire Housing Safeguarding Policy
- Aspire Group Anti-Harassment & Bullying Policy
- Aspire Group Whistleblowing Policy
- Violence and Aggression Policy

- Aspire Group Procurement Policy

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

In the 2017/18 financial year the induction process has been reviewed. All new starters are required to read and understand the Corporate Strategy and Equality & Diversity Policy in the first week of employment, alongside completion of an e-training module on Equality. This training supports Aspire's commitment to supporting a diverse culture where equal opportunity is promoted actively and in which unlawful discrimination is not tolerated.

This financial year a number of our policies underpinning our commitment to Modern Slavery have been revised as part of the policy framework review. The Aspire Group Equality and Diversity Policy was reviewed in April 2017, the Aspire Housing Safeguarding Policy was revised in July 2017, a new Procurement Policy was written in June 2017, a new Violence and Aggression Policy was written in October 2017, and the Aspire Group Whistleblowing Policy was revised in July 2018.

In addition to policies we have delivered training programs to reinforce our approach to Modern Slavery. An E-learning training module has been completed by the Neighbourhood team and is accessible for all staff requiring training in modern slavery. The Safeguarding Policy, launched in April 2015 (and rereleased in July 2017) states that all front-line employees should be trained to Safeguarding Children and Adults Level 1 every three years. In addition to this Safeguarding Child Abuse and Neglect Level 1 training has been completed by all front-line housing employees and this is refreshed every three years. Within PM Training all staff, including the PM Board, have completed Understanding Pathways of Extremism training, and Prevent and Radicalisation Training to identify children at risk of being drawn into terrorism. All PM Training staff have also completed Mental Health Awareness training.

To further strengthen our supply chain controls we have created a check-list of a number of terms in relation to modern slavery, which we are not willing to compromise when agreeing to supplier terms and conditions.

This statement has been shared with all staff, along with details of resources including Modern Slavery Helpline (0800 0121 7100) and the Stronger Together initiative (www.stronger2gether.org).

Further steps

In the 2018/19 financial year all of Housing Services front line staff will receive mental health training, and the Aspire Response Operatives will receive Child Abuse and Neglect Level 1 training.

In the 2018/19 financial year we plan to update a number of policies that underpin our approach to Modern Slavery. These include the Aspire Group Anti-Harassment & Bullying Policy and the Aspire Group Whistleblowing Policy (already revised in July 2018).

We will also be investigating the addition of modern slavery clauses to all new commercial leases.

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 2018.

Philippa Holland

Aspire Housing Chair

11 September 2018