



# Slavery & Human Trafficking (Modern Slavery Act Transparency) Statement

For the year ending 31 March 2025

# Table of Contents

Introduction	02
Our values	03
We champion the customer	03
We build togetherness	03
We are professional	03
Our structure	04
Our supply chains	05
Our policies	06
Training and communication	07
Due diligence, risk assessment and mitigation	09
Effectiveness in ensuring that Slavery and Human Trafficking is not taking place in business or supply chains	10
Priority steps for the next coming year	11

# 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.

**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 ninth 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 435 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 colleagues 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 has been undertaken of all contracts within our contracts register and each contracted supplier has been assigned a low, medium or high modern slavery risk rating to ensure that we have sight of modern slavery risk and include these suppliers within our due diligence activities.

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, issued to all current suppliers in 2023 and new suppliers thereafter, 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. We also require suppliers that do not operate under a contract to comply with the requirements of our Supplier Code of Conduct as part of our invoice payment process. 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.

Regular contract management meetings are held with all contracted suppliers, supported by our Procurement team for all strategic contracts, which provides an opportunity to discuss any support requirements around Modern Slavery and Safeguarding etc. A consolidated contract management toolkit has also been created which includes guidance, templates, agendas and required frequency of meetings for all contract managers depended upon the nature and risk of the contract to Aspire. Modern slavery requirements form part of the annual checks carried out by contract managers for high-risk contracts.

## Our policies

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 2025)
- Recruitment and Selection Policy (last updated May 2025)
- Safeguarding Policy (last updated March 2024)
- Anti-Harassment & Bullying Policy & Procedure (last Updated May 2025)
- Whistleblowing Policy (last updated April 2024)
- Violence and Aggression Policy (last updated June 2024)
- Value for Money "VFM" Strategy (outlines procurement requirements)

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. In 2025, we extended mandatory modern slavery training to all front-line colleagues. 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 have also built a range of Equality, Diversity and Inclusion training into our mandatory training programme for 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 released new content for all colleagues in 2025. 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 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.
- Roll out of Equality Impact Assessments (EIAs); an evidence-based approach designed to help organisations ensure that their policies, of Equality Impact Assessments (EIAs); an evidence-based 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.
- Creation of a new People & EDI Strategy, and Customer Strategy which includes EDI themes, commitment and actions for colleagues and customers.

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 was 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 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. All of our 148 suppliers have been assigned a risk category, with 5 contracts assigned high risk in areas of cleaning, scaffolding, grounds maintenance and development. 58 suppliers have been classed as medium risk and 85 as low risk.

We have carried out checks on all high-risk suppliers and a sample of medium-risk 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. All suppliers will be offered support and guidance to draft their own Modern Slavery Statement if they do not already have a statement in place.

A modern Slavery checklist has been created and all suppliers will be required to complete this according to their modern slavery risk. High risk suppliers will be required to complete this on an annual basis, with low and medium

risk suppliers asked to complete on a rolling 3-year basis. The checklist covers key aspects of modern slavery risk assessment and management, such as a confirmation that colleagues are paid a fair and equal wage, suppliers have evidence of Eligibility to work in the U.K in place for all employees, that supplier's employee working hours comply with national laws and standards as set out in the Working Time Regulations 1998 and that suppliers carry out Risk Assessments of Human Trafficking and Slavery within your own supply chain.

*“Failure to comply with legal or regulatory requirements”* is a risk listed within Aspire's Finance Risk Register, which incorporates Modern Slavery. Safeguarding is listed within Aspire's Corporate 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. A link to the Code of Conduct is also included within all invoices and purchase orders, contract documentation for all new and existing suppliers and within our supplier onboarding pages and information pack. Aspire reserves the right to terminate contracts if the supplier does not comply.

A review of our processes for procurement, contract management, ordering and payments has been completed to include a greater focus on the requirements of the Modern Slavery Act and our commitments in this area.

## **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 2025, 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.

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](http://www.stronger2gether.org)).
- Aspire Housing's Modern Slavery statement 2025 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.
- 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.
- A review of our processes for procurement, contract management, ordering and payments has been completed. 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.
- In order to bolster our supplier checks, a modern Slavery checklist has been created and all suppliers will be required to complete this according to their modern slavery risk. High risk suppliers will be required to complete this on an annual basis, with low and medium risk suppliers asked to complete on a rolling 3-year basis.

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 2025.**

Aman Dalvi

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

On behalf of the Aspire Housing Board

24th June 2025.



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

**01782 635200 | [www.aspirehousing.co.uk](http://www.aspirehousing.co.uk)**

A registered society with the Financial Conduct Authority, Registration Number 31218R.  
Registered with the Regulator of Social Housing L4238  
Registered office: Aspire Housing Limited, Kingsley, The Brampton, Newcastle-under-Lyme, Staffordshire ST5 0QW.