

MODERN SLAVERY ACT STATEMENT 2021

Trafford Housing Trust is a charitable housing trust providing over 9,000 quality homes within the Trafford area and beyond, housing over 18,000 people. We are a profit for purpose organisation, striving for a society transformed, free from poverty, inequality and injustice. We stand for trust, innovation and most importantly impact

The Trust is committed to the highest level of ethical standards and governance. We have zero tolerance towards modern slavery and human trafficking and all forms of bribery and corruption associated with these criminal activities. The Trust will ensure that it complies with all legal and regulatory responsibilities including the Modern Slavery Act 2015. We take care to ensure that slavery and human trafficking does not exist in any part of Trafford housing Trust's business or wider supply chain.

This statement covers Trafford Housing Trust Ltd and its wholly owned subsidiaries.

Our Approach

Trafford Housing Trust has reviewed areas of the business where modern-day slavery and/or human trafficking could exist. We will continue to liaise with our contractors and partners in our supply chain to establish working practices in line with the Ethical Trading Initiative (ETI) Base Code set by the International Labour Organisation namely:

1. Freely chosen employment
2. Freedom of association and the right to collective bargaining
3. Safe and hygienic working conditions
4. No use of child labour
5. The provision of living wages
6. No excessive working hours
7. No discrimination
8. Provision of regular employment
9. No harsh or inhumane treatment

The Trust has established the following arrangements to minimise the risk of modern day slavery in its activities and to support the continued ethical delivery of our services:

Procurement and Supply Chain Management:

- We continue to adopt a formally approved Procurement Strategy and supporting staff guidelines which were approved by senior management and published to all staff.
- Our tender documentation continues to include the mandatory exclusion of any bidder who has been convicted of an offence under the Modern Slavery Act 2015.
- We will assess any evidence of non-compliance and take appropriate remedial action to ensure we are only trading with those who fully comply with this statement.

Employment Practices:

- We continue to require new employees to produce original documentary evidence of a right to work in the UK on commencement of employment.
- We recognise three trade unions and support their involvement in respect of employee rights.
- We continue to be a Living Wage employer, who pays the Living Wage Foundation's Living Wage. This commitment goes over and above any statutory minimum wage rates.
- Our Whistleblowing Policy is consistent with best practice to ensure that concerns that staff or others may have can be raised without fear of reprisal.

Housing Services:

- We carry out an interview at the start of a tenancy to check someone's ability to sustain a tenancy. This is mainly focused on money and benefits but where a concern is identified, tenancy visits are carried out during the first 12 months of the tenancy.
- We continue to train and support staff in discharging the Trust's safeguarding duty. All staff complete mandatory e-learning on safeguarding which includes modern day slavery.
- We have re-established our safeguarding Steering Group which oversees the Trust's safeguarding framework and reviews all reported safeguarding cases.
- We act promptly where we are made aware of any suspicious activity.

Assurance

- We will continue to ensure that risk assessments and risk registers are up to date and will report to the THT Board regularly to ensure that we remain aware of the risk areas in our business.
- Our Modern Slavery Statement is published on our website and informs our Procurement and Contracts Policy.
- We will seek advice from the company's legal advisors where appropriate.
- The Trust's internal auditors completed an internal audit of our safeguarding arrangements within the 2019/20 Internal Audit Plan which resulted in a rating of Adequate Assurance.
- We have completed our annual self-assessment against the Regulator of Social Housing regulatory standards and issued its statement of compliance.

Considerations

- In 2021 THT joined the Slave Free Alliance (SFA) and we are working with them to continuously review and improve our processes to tackle modern slavery.
- We will continue to adapt existing policies to reference the Modern Slavery Act 2015/Modern Slavery Transparency Statement.
- We will continue to consider the impact of the UK's departure from the EU on procurement practices and ensure that any changes are implemented with a reference to the Modern Slavery Act 2015.
- We will continue to refer to Home Office guidance and resources and are registered to receive updates from the Modern Slavery Contact Database.

Period Covered by this Statement

This statement is made under section 54(1) of the Modern Slavery Act 2015. It represents the Trust's slavery and human trafficking statement and is made for the year 1 April 2020 to 31 March 2021. As the Trust's financial year commences on 1 April each year, this statement also covers the whole of the Trust's 2020/21 financial year, 1 April 2020 to 31 March 2021. The turnover of Trafford Housing Trust Ltd exceeds £36m for that period. This statement will be reviewed and updated on an annual basis and was approved by the Trafford Housing Trust Ltd group board on 3 September 2021.

Further Reading

For further information and support visit modernslaveryhelpline.org or contact the Modern Slavery Helpline on 0800 0121 700.

Sean Anstee
Chairman
3 September 2021

Larry Gold
Chief Executive Officer
3 September 2021