



## **MODERN SLAVERY ACT TRANSPARENCY STATEMENT 2018**

Laurus Homes the trading name for THT Developments LTD, which is Trafford Housing Trust's property development company. Trafford Housing Trust is an independent housing organisation with big ambitions; a local company with national reach. As a housing company providing over 9,000 quality homes within the Trafford area, our main business is about being an excellent social landlord.

The Trust is committed to the highest level of ethical standards and governance, the Trust has zero tolerance towards modern slavery and human trafficking, and all forms of bribery and corruption associated with these criminal activities.

The Trust will ensuring that we comply 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 subsidiaries.

### **Our Approach**

Trafford Housing Trust has completed a risk assessment of where modern-day slavery and/ or human trafficking may be prevalent. 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 have updated our Procurement Strategy and supporting staff guidelines which have approved by senior management and published to all staff.
- Existing tender documentation includes the mandatory exclusion of any bidder who has been convicted of an offence under the Modern-Day Slavery Act 2015.
- We will assess any evidence of non-compliance and will take appropriate remedial action to ensure we are only trading those who fully comply with this statement.

## Employment Practices:

- We require new employees to produce original documentary evidence of a right to work in the UK on commencement of employment.
- We recognise four 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.
- We have a newly updated Whistleblowing Policy which is consistent with best practice to ensure any concerns that staff or others may can be raised without fear of reprisal.

## Housing Services:

- We carry out a risk assessment at the start of a tenancy to identify if there is any cause for concern about the tenant or their ability to sustain a tenancy. Where a concern is identified, tenancy visits are carried out during the first 12 months of the tenancy.
- We train and support staff in discharging the Trust's safeguarding duty, staff continue to complete mandatory e-learning on safeguarding which includes modern day slavery.
- We act promptly where we are made aware of any suspicions of such criminal activities.

## Assurance

- The Trust will ensure that risk assessments and risk register up to date and will report to the Audit, Risk and Compliance Committee regularly to ensure that we remain aware of the risk areas in our business.
- We have published our modern-day slavery statement and Procurement Policy on our internal policy centre (IRIS).
- The Trust will seek advice from the company's legal advisors where appropriate

## Considerations

- The Trust will continue to adapt existing policies to reference the Modern Slavery Act 2015 / Modern Slavery Transparency Statement.
- The Trust will consider the changes arising from 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.

## Further Reading

For further information and support visit [modernslaveryhelpline.org](http://modernslaveryhelpline.org) or contact the Modern Slavery Helpline on 0800 0121 700

This statement is made under section 54(1) of the Modern Slavery Act 2015. It represents the Trust's slavery and human trafficking statement for the year ending 31<sup>st</sup> March 2018. The turnover of Trafford Housing Trust Ltd exceeds £36m for that period. This statement will be reviewed and updated on an annual basis and is approved by the Trafford Housing Trust Ltd group board.



**Edna Robinson**  
Chairman

30 September 2018



**Matthew Gardiner**  
Chief Executive

30 September 2018