

Anti-slavery and Human Trafficking Statement

Introduction from the Chief Executive

In October 2015, the Modern Slavery Act came into force. The Act requires large companies with a turnover of over £36m, which supply goods, or services, to publish information each financial year to reflect the steps taken to ensure there is no slavery or human trafficking in their business or supply chains.

Sapphire Independent Housing (SIH) is a registered housing association which provides accommodation and support to single people in housing need.

Although our turnover is less than £36 million per annum and we do not have a legal obligation to publish this statement, we believe in the basic principles of human rights and consider this document as a matter of good practice.

I am pleased to confirm that to the best of our knowledge there is no slavery or human trafficking in our business or with any of our wider supply chain partners. We all have a responsibility to be alert to the risks of slavery and human trafficking, however large or small, in our business or in our supply chains

Organisation's structure

SIH own and manage 372 homes in London and Hertfordshire. We have 380 residents and we employ 50 members of staff.

Our business

Our core purpose is to provide accommodation to single people in homeless need and our activities are regulated by the Regulator for Social Housing (RSH)

Due diligence processes for slavery and human trafficking

Our business

We only use specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from that agency. This is reflected in our Recruitment & Selection Policy.

As an employer we are committed to paying the London Living Wage to all our staff and we regularly review our terms of employment to ensure that they comply with all relevant legislation.

Employees are provided with clear and transparent information about rates of pay, hours worked and legal deductions.

We expect all employees to adhere to SIH's Staff Code of Conduct.

We ensure that we have systems in place with an overarching policy statement as well as a whistle blowing policy to encourage the reporting of concerns and the protection of whistle blowers

Our staff who are in contact with our residents and service users are trained to identify any safeguarding issues, which include signs of exploitation, and comply with the referral process to ensure that incidents of this nature are

reported to managers who then work with other agencies such as Local Authority Social Services and the Police.

Our safeguarding and anti-tenancy fraud policies and procedures enable us to take the appropriate action if slavery or human trafficking is identified by us within our homes or by our customers.

Our supply chains

Our supply chains include the sourcing of products and services related to the development and management of housing.

Our procurement activities take place in England and our contractors and suppliers are UK based.

Our robust tendering process ensures we engage with reputable contractors who adhere to all appropriate legislation, regulation and practices. Our contract management arrangements help us ensure they maintain the standards required.

All our policies are reviewed on a continuous basis to ensure that they reflect best practice and to mitigate against risks.

Staff awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, all staff and directors have been briefed on the subject. Training will be provided to staff where relevant. Assurance on modern slavery will be built into our assurance plan.

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 ending 31 March 2018.

A handwritten signature in black ink, appearing to read 'Heather Thomas', with a horizontal line underneath.

Heather Thomas, Chief Executive