



Modern Slavery and Human Trafficking Statement

As required by the [Modern Slavery Act 2015](#), the following statement outlines what action we have taken to ensure there is no modern slavery in our business or supply chains.

Catalyst Modern Slavery statement

As a registered provider of social housing, [we employ 650 people and provide 21,000 homes in London and the South East](#). We are a landlord with strong sense of social purpose, driven by our values: open, integrity, caring, and inclusive. Our work is focused on the welfare of our customers, and we work with multiple agencies to identify and support vulnerable residents. We also aim to be a great place to work for all of our employees.

We are committed to tackling modern slavery and human trafficking in our business and supply chains, particularly in areas of operation which pose a higher risk, such as construction and cleaning services. We have a number of supply chains across our business to help build, manage, and maintain our homes and we require our suppliers and contractors to comply with the Act in order to work with us.

Our policies and procedures

Our policies and procedures help identify cases of modern slavery amongst our supply-chain, our employees and our residents. Our current approach includes:

Safeguarding

Our safeguarding policy and procedures provide measures to identify abuse or neglect, including modern slavery and human trafficking. They give details of how to report incidents and how to refer cases to the appropriate authorities where required.

Tenancy Audit

We visit all our tenants on a rolling basis as part of our tenancy audit programme. During these visits, we check for signs of modern slavery and human trafficking, as well as any other welfare concerns which the tenants or members of their households may have. Where we have concerns, we use the information gained through the tenancy audit in line with our wider safeguarding approach. This may include another visit without notice, legal action and / or referral to appropriate authorities.

Whistleblowing

We support anyone working for us directly, or indirectly through a supplier, who raises any concerns about actual or suspected criminal offences, including modern slavery or human trafficking. In the last year, we have updated our whistleblowing policy and processes to improve their effectiveness and make it easier for whistleblowers to provide us with information, with confidence that we will take it seriously.



Employees

We treat all our employees fairly and equally.

- Our robust recruitment processes include verifying each employee's identity and their right to work in the United Kingdom before they start work with us;
- We monitor hours worked, rates of pay and the calculation of legal deductions;
- We pay at least the London living wage and provide all employees with the same organisational benefits;
- Employees are encouraged not to work in excess of the number of hours permitted by law;
- We make salary payments directly to employees and do not delay, defer or withhold payments unless there is prior agreement or notification; and
- Our free, comprehensive 24-hour employee assistance service offers guidance and counselling relating to both the work activities and personal lives of our employees. This independent service allows employees to raise concerns in a confidential manner.

Training

We have a comprehensive programme of compliance training for employees which explains our code of conduct and how to report any behaviour which does not meet our standards. Our safeguarding training teaches our customer-facing colleagues how to spot signs of modern slavery and trafficking when visiting our residents in their homes and on our estates.

Procurement

Our suppliers are required to comply with relevant legislation and regulation, to follow our policies, and to understand the needs of the vulnerable people we work with.

Since the last statement, we have:

- Introduced specific requirements for suppliers to confirm compliance with Section 54 of the Modern Slavery Act 2015 and provide evidence of compliance;
- Introduced a centralised and fully maintained 'contracts register' containing all of Catalyst's contracts which has allowed us to review and amend terms with suppliers so that they deliver against our requirements;
- Started to re-procure all our development and asset management suppliers; and
- Tendered our repairs and maintenance contracts requiring suppliers to pay, as a minimum, the relevant living wage for the area they are working in.

Improving our approach to Modern Slavery and Human Trafficking

We are transforming the way we deliver our services, which gives us an opportunity to introduce additional ways of monitoring cases of modern slavery.



This includes reviewing our:

- programmes of compliance and safeguarding training - To improve employees' ability to spot abuse and neglect and give them the tools to refer issues to the correct agencies. This will include using new e-learning modules to refresh training across the business.
- approach to procurement - By updating our procurement policy and procedures and continuing to review and amend terms with suppliers so that they deliver against our requirements, and re-procuring where appropriate. This re-procurement will require all suppliers to meet the living wage for the area they are working in. We are also ensuring that contractors working on our sites have the correct permits for working in the UK and are appropriately trained for the work they are undertaking.
- Recruitment and Selection Policy - To ensure that we source employees from specified, reputable employment agencies.

This statement was approved by the Board on 19 September 2018

Signed.....

Date.....

19 / 9 / 18

