



## **Modern Slavery and Human Trafficking Statement**

As required by the [Modern Slavery Act 2015 \(the Act\)](#), the following statement outlines what action we have taken to prevent modern slavery from arising in our business or supply chains.

This statement applies to Catalyst Housing Limited (Catalyst), Aldwyck Housing Group Limited (Aldwyck) and their subsidiaries.

### **Modern Slavery statement**

As a registered provider of social housing, Catalyst employs 650 people and provides 21,000 homes in London and the South East. Aldwyck joined the Group on 1 May 2019 bringing with it a further 500 people and 11,000 homes in counties north of London, including Bedfordshire, Hertfordshire and Buckinghamshire.

We are landlords with a strong sense of social purpose, driven by our long history of acting ethically and with integrity in all our business relationships. 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 colleagues.

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 among our supply-chain, our business and our communities. Our current approach includes:

#### **Safeguarding**

Our safeguarding policy and procedures provide measures to identify abuse or neglect, including modern slavery and human trafficking. They set out how to report incidents and 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.

We have updated this approach through our revised Anti-bribery, Fraud and Corruption Policy, which applies to both Catalyst and Aldwyck.

### **Whistleblowing and Code of Conduct**

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 Procedures to improve their effectiveness and make it easier for anyone with concerns to provide us with information, with confidence that we will take it seriously and treat it confidentially.

We also have a Code of Conduct in place which requires colleagues and board and committee members to report any concerns about the abuse of vulnerable people.

### **Colleagues**

We treat all our colleagues fairly and equally.

- Our robust recruitment processes include verifying each colleague's identity and their right to work in the United Kingdom before they start work with us;
- We monitor rates of pay and the calculation of legal deductions;
- We pay at least the Living Wage, or for colleagues working within London, the London Living Wage and provide all colleagues with core organisational benefits;
- Colleagues are encouraged not to work in excess of the number of hours permitted by law;
- We make salary payments directly to colleagues and do not delay, defer or withhold payments unless there is prior agreement or notification; and
- Our free, comprehensive 24-hour Employee Assistance Programme offers guidance and counselling relating to both the work activities and personal lives of our colleagues.

### **Training**

We have a comprehensive programme of compliance training for colleagues which explains our Code of Conduct and how to report any behaviour which does not meet our standards. Our safeguarding training is delivered to our customer-facing colleagues and includes information on how to spot signs of modern slavery and human 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.

We have:

- Specific requirements for suppliers tendering for contracts to confirm compliance with Section 54 of the Modern Slavery Act 2015 and to provide us with evidence of this;
- 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;

- Processes in place for the continuous review of our development and asset management suppliers (traditionally higher risk areas); and
- Recently tendered our repairs and maintenance contracts requiring suppliers to pay, as a minimum, the relevant Living Wage for the area they are working in.

Since the last statement, we have built on this by:

- Updating our procurement policy and procedures for both Catalyst and Aldwyck;
- Continuing to review and amend terms with suppliers so that they deliver against our requirements;
- Re-procuring where appropriate and, where we re-procure, requiring suppliers to meet the living wage for the area they are working in; and
- 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.

### **Improving our approach to Modern Slavery and Human Trafficking**

- As part of the integration process after the merger with Aldwyck, we are conducting a thorough review of all:
  - Business areas: Which gives us an opportunity to introduce additional ways of monitoring cases of modern slavery and embedding good practice;
  - Policies: Which will be updated to reflect the business review bolstering our practices to combat modern slavery;
  - Training: Safeguarding training to front line colleagues has been refreshed, which will improve their ability to spot abuse and neglect and give them the tools to refer issues to the correct agencies. This will be rolled out to new employees linked to our induction processes; and
  - Recruitment and Selection Policy: To ensure that we source colleagues from specified, reputable employment agencies.

This statement will also be published at the Modern Slavery Registry.

This statement was approved by the Board on 18 September 2019

Signed.....

Date.....

24/09/19

