



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) and its subsidiaries.

Modern Slavery statement

Catalyst is one of the UK's leading housing associations, with over 34,000 homes in London and the south east. Regulated by the Regulator of Social Housing (RSH), we are a landlord 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 and human trafficking in 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. These set out how we 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.

Our approach is set out in our Anti-bribery, Fraud and Corruption Policy.



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.

Our Whistleblowing Policy and Procedures 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 supports colleagues and board and committee members to understand their responsibilities and 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 have created a recruitment policy for temporary staff, to make sure that we source colleagues from specified, reputable employment agencies
- 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
- 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. All colleagues receive safeguarding e-learning and additional safeguarding training is delivered annually 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 Act 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)
- Requirements in our repairs and maintenance contracts for suppliers to pay, as a minimum, the relevant Living Wage for the area they are working in
- Continued to review our procurement policy and procedures and our terms with suppliers so that they deliver against our requirements
- Ensured 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

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

- Updating our terms and conditions to include the right to carry out site visits where appropriate
- Adding a greater focus on Social Value within the procurement process
- Increasing our efforts to engage with SME's

Improving our approach to Modern Slavery and Human Trafficking

- We plan to further re-design tender questions to ensure all bidders provide evidence of their compliance with the Modern Slavery Act
- We intend to develop a Supplier Code of Conduct outlining our expectations of suppliers to do their part in eradicating Modern Slavery within their own supply chains for inclusion with all tender opportunities
- We intend to ensure Modern Slavery clauses are included in Supplier agreements

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

This statement was approved by the Board on 23 September 2020

Signed.....

Date..... 29.09.20