



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 and human trafficking from arising in our business or supply chains. This statement applies to Catalyst Housing Limited (Catalyst), Rosebery Housing Association Limited and their 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. Rosebery Housing Association Limited joined the Group on 1 April 2021 enlarging us by a further 2,770 homes in Surrey and West Sussex.

Regulated by the Regulator of Social Housing, 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

During home 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 undertake a tenancy audit to investigate the matter and take any action needed to resolve the issue and offer support 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-Fraud, Bribery and Corruption Policy.

Subletting

We thoroughly investigate reports of subletting and take robust action against this. We work closely with local authorities and other statutory agencies to investigate and support



prosecutions where it is appropriate and issue money claims to prevent profiteering from subletting social housing.

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
- Updated our terms and conditions to include the right to carry out site visits where appropriate
- Added a greater focus on Social Value within the procurement process
- Increased our efforts to engage with SMEs

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

- inserting Modern Slavery clauses within our Supplier agreements particularly the agreements within Connect Property Services Limited

Improving our approach to Modern Slavery and Human Trafficking

- We intend to implement 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

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

This statement was approved by the Board on 22 September 2021

Signed.....

Date.....23/09/21
Signed on 23 Sep 2021, 1:18 PM BST