

# Slavery and Human Trafficking Statement for the Year Ended 31 March 2021

## 1. Organisational Structure and Supply Chains

Octavia Housing (The Group) is a charitable housing association, registered as a Co-Operative and Community Benefit Society with the Financial Conduct Authority and as a Registered Provider of Social Housing with the Homes and Communities Agency. It forms the holding entity of a group which includes the following subsidiaries:

- a. Octavia Hill Limited
- b. Octavia Living Limited
- c. Octavia Development Services Limited
- d. Octavia Foundation

Our activities take place solely in England and relates to the provision of affordable housing and related services for people in central and west London. In doing so, we participate in some partnering arrangements with suppliers and contractors.

Through this Statement we encourage our delivery partners, suppliers and others within our frameworks with whom we engage to read and apply, as appropriate, the requirements of The Modern Slavery Act (the Act) 2015 and to confirm to us their approach to compliance.

## 2. Supply Chain Policy

Our procurement activities take place in England and our contractors and suppliers are predominantly UK and EU based. Our major contractor partnering arrangements are for repairs and property maintenance activities and we also manage a development framework with other housing associations.

We expect our delivery partners, organisations within our frameworks and other suppliers we engage with to ensure their goods, materials and labour-related supply chains to:

- a. Fully comply with the Act
- b. Be transparent, accountable and auditable; and
- c. Be free from ethical ambiguities.

## 3. Our Employment Practices

Our policy is to pay all our employees at least the London Living Wage and our recruitment processes are designed to ensure that all new employees have the right to work in the UK.

We are in touch with all the employment agencies which we use to ensure that they have confirmed their compliance with the Act and sent us a copy of or link to their Compliance Statement. If their turnover is below the minimum required for compliance, we have asked for confirmation that they are committed to mitigating any associated risks.

Employees are encouraged to report evidence of non-compliance with the Act, including any concerns about our supply chains or any issues relating to the association's residents through our Whistleblowing policy.

#### **4. Steps Taken**

Our Safeguarding Policies are reviewed annually. A Safeguarding KPI Is reported to the Group Board each month and no modern slavery related incidents or concerns relating to service delivery have been reported since the 2015 Act was enacted.

We require our contractors to provide a declaration that they are not involved in modern slavery or human trafficking and have not been subject to any investigation in connection with any offence involving slavery or human trafficking.

We require all contractors to be accredited with Constructionline, which includes a requirement to comply with the Act and credentials are regularly reviewed by Constructionline. Provisions have also been included in all Asset Management procurement process that any potential supplier not complying will be excluded from the bidding process.

We ensure we only trade with those who fully comply with our supply chain policy or those who are taking verifiable steps towards compliance.

#### **5. Training**

We provide mandatory training to relevant staff to raise awareness of the risks of modern slavery and human trafficking in the organisation's supply chain and other parts of the business. This is done on an annual basis via an e-learning module. In addition safeguarding training has been carried out across the organisation.

#### **6. Due Diligence**

We continue to take the appropriate steps to ensure that there is no modern slavery or human trafficking in our supply chains. This includes incorporating provisions within our tender processes that would-be suppliers have appropriate anti-slavery and human trafficking policies and procedures and have carried out due diligence to ensure that there is no slavery or human trafficking in their supply chains. This also includes creating and circulating an assurance form to all current and future HR agencies to provide guarantee that the legislation is being complied with.

The Leadership Group is responsible for compliance within their respective departments and of the organisation as a whole.

This statement is made in accordance with Section 54 of the 2015 Act. It will be updated annually in line with the Modern Slavery's Act's reporting requirements.

Sandra Skeete, CEO



Date: 29<sup>th</sup> April 2021