



Slavery and Human Trafficking Statement

Introduction

This statement is made in accordance with Part 6 Section 54 of the Modern Slavery Act 2015. Central & Cecil Housing (C&C) and its subsidiary companies are committed to ensuring that there is no slavery or human trafficking in any part of our business or our supply chains. We are committed to acting ethically and with integrity in all our business relationships and ensuring we have effective policies, procedures and internal controls to safeguard against any slavery and/or human trafficking in our organisation and supply chains.

Business and Organisational Structure

C&C is a charitable organisation registered as a Community Benefits Society. There are two subsidiary companies, neither of which are charitable:

- Central & Cecil Construction Services Limited which provides design and build services
- Central & Cecil Innovations Limited which is the commercial trading subsidiary

All C&C activity takes place within the United Kingdom, with housing and services being provided to residents in London and the Home Counties.

Our Supply Chains

C&C and its subsidiaries source goods and services almost exclusively from UK based suppliers. As a registered housing association, C&C is considered to be a contracting authority and therefore subject to the Public Contract Regulations 2015. This means that we are governed by directives to ensure that the principles of non-discrimination and transparency are upheld.

We source our supplies, services and works from third party suppliers principally within the United Kingdom. The greatest risk to C&C in relation to the Modern Slavery Act is through its supply chain. To mitigate this risk we undertake due diligence of suppliers. Our detailed Procurement Policy states the following:

- All existing suppliers with a turnover of more than £36 million will be required to provide a copy of their Slavery and Human Trafficking Statement.

- The tendering of new contracts will include an obligation that suppliers comply with the Modern Slavery Act.
- Any supplier who tenders for work is required to inform us if they or any of their sub-contractors have had a complaint against them upheld following an investigation by the Equality and Human Rights Commission.
- Any new contracts that we enter into we will seek to impose provision for termination in the event of a modern slavery or human trafficking compliance breach by a supplier.

Training

All staff will be made aware of our slavery and human trafficking statement through our internal communications. Training will be focused on staff with procurement responsibilities.

We expect our staff to report concerns and for managers to act upon them, referring any matters to appropriate agencies as necessary¹.

Relevant Policies

In addition to the Procurement Policy, we have other policies in place which help mitigate the risk of slavery and human trafficking within our business. These include:

- Procurement Policy
- Employee Code of Conduct
- Confidential Reporting (Whistle Blowing Policy)
- Diversity Policy
- Anti-Fraud and Theft Policy
- Safeguarding Policy
- Disciplinary Policy
- Disclosure and Barring Service Policy
- Grievance Policy
- Recruitment and Selection Policy

Review

We will continue to review our business operations to identify any parts that may be at risk of slavery and human trafficking and we will update this statement periodically in light of this.