

# Octavia Housing

## Slavery and human trafficking statement

Octavia Housing 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 Regulator of Social Housing.

Our activities take place solely in England and our business relates to the provision of affordable housing and related services for people in north, central and west London. In doing so we participate in partnering arrangements with suppliers and contractors and 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 2015 and to confirm to us their approach to compliance.

### **Our 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:

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

### **Our Employment Practice**

We are committed to equality and diversity in its broadest sense as we represent a range of ages, backgrounds, ethnicities and abilities through our customers, partners and employees. Our Equality and Diversity policy covers our service and staff commitments, values and incorporates our objective to treat everyone with respect and dignity and sets out our plans for delivering our commitments. The policy is reviewed on a regular basis.

We are in touch with the employment agencies we use to ensure that where necessary they have confirmed their compliance and provided us with a copy of their Modern Slavery Statements. If

their turnover is below the minimum required for compliance, we have asked for confirmation that they are committed to mitigating any associated risks.

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

## **Our Due Diligence**

- We continue to take appropriate steps to ensure that there is no modern slavery or human trafficking in our supply chains including 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.
- 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 ensure we will only trade with those who fully comply with our supply chain policy or those who are taking verifiable steps towards compliance
- We provide 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.
- The Leadership Group is responsible for compliance within their respective departments and of the organization as a whole.