



## **Community Gateway Association**

### **Modern Slavery and Human Trafficking Statement 2024/25**

#### **Introduction**

The Modern Slavery Act (the Act) seeks to prevent the exploitation of workers and to stop human trafficking. The Community Gateway Association group of companies (the Group) does not tolerate any form of exploitation, and we are committed to preventing modern slavery and human trafficking in our business and our supply chains, including taking steps to ensure that companies operating within our supply chains comply with the principles in the Act.

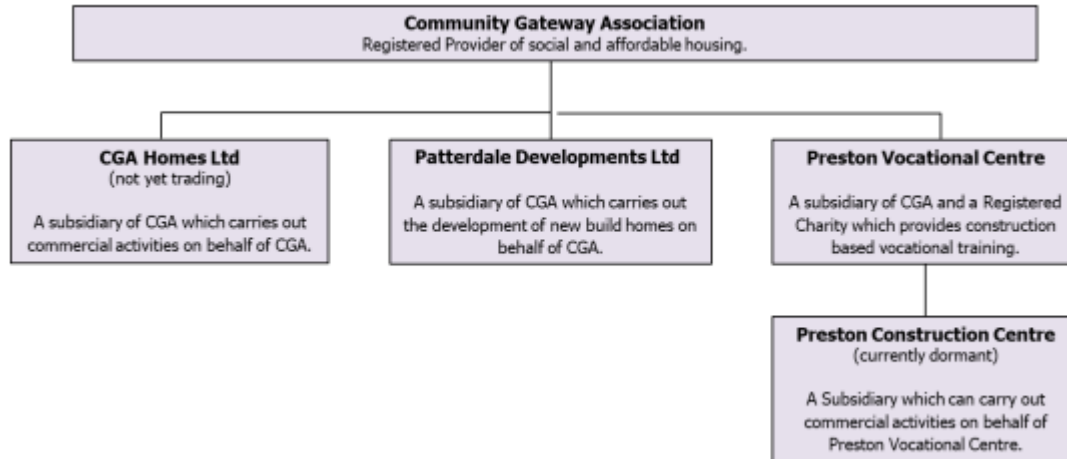
This statement sets out the Group's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As a registered provider of social housing, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking. We operate with a strong sense of social purpose and ethical responsibility. Our work is focused on supporting the welfare of our customers, including those who are vulnerable or require additional support to live independently. The Group actively engages in a range of local partnerships and multi-agency forums linked to the prevention and detection of crime including modern slavery.

This statement sets out the steps the Group has taken to address slavery and human trafficking during the financial year 1st April 2024 to 31st March 2025.

#### **The CGA Group of Companies**

The Group employs approximately 300 people and provides housing related services to more than 7000 homes across the city of Preston and surrounding areas. The majority of services we provide relate to the homes we own and rent. The Group only trades in the UK and our structure is outlined in the diagram below:



## Responsibilities

This statement is approved by the Parent Board of the Group.

The Executive Leadership Team (ELT) is responsible for overseeing CGA's overall approach to safeguarding, including modern slavery and human trafficking. The Group's managers have primary and day-to-day responsibility for implementing this statement, monitoring its use and effectiveness, dealing with any queries about it and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

The prevention, detection and reporting of modern slavery in any part of the Group's business or supply chains is the responsibility of all those working for the Group or under its control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy statement.

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage. Through our active involvement in local partnerships, we have developed clear pathways to enable concerns regarding modern slavery and human trafficking to be reported to relevant agencies.

Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of the business relationship and reinforced as appropriate thereafter.

## Risk Management

The Group actively manages risk in line with its Risk Management Strategy. We maintain a comprehensive risk management framework and work closely with our Internal Auditors to gain assurance that controls put in place to mitigate risks are designed and operating adequately and effectively.

It is considered that the sectors in which the Group operates present a low risk in relation to modern slavery and human trafficking. The areas of the business where modern slavery and human trafficking are most likely to occur relate to CGA's tenants and its supply chain.

### **Policies and Procedures**

Our policies and procedures are regularly reviewed to ensure they remain up to date and reflect our regulatory and statutory obligations. We have a number of relevant documents that contribute to ensuring that modern slavery does not occur within our business or that of our supply chain, including:

- Anti-Fraud, Bribery and Corruption Policy and Procedure
- Anti-Money Laundering Policy and Procedure
- Anti-Social Behaviour and Hate Crime Policy
- Domestic Abuse Policy
- Domestic Abuse (employees) guidance document
- Employee Code of Conduct
- Equality, Diversity and Inclusion Strategy and Policy
- Financial Regulations
- Health and Safety Policy
- Preserved Right to Buy Procedure
- Probity Policy
- Procurement Policy
- Risk Management Strategy
- Recruitment and Selection Procedure
- Safeguarding Procedure
- Select Move Sub-Regional Common Allocations Policy
- Succession, Assignment and Variation of Tenancy Policy and Procedure
- Vulnerabilities and Reasonable Adjustments Strategy and Policy
- Whistleblowing Policy and Procedure

### **Training**

Training is vital in ensuring that we minimise the risks of modern slavery happening in our properties and our supply chains. We have provided training to all colleagues through our mandatory safeguarding training, to ensure that our people have a good

awareness of situations which suggest vulnerable people may be being exploited. We also offer bespoke training to our front-line colleagues and make sure they understand our Safeguarding Policy. This training is reviewed and updated annually. Our Safeguarding Procedure sets out processes to identify, report and refer cases to relevant authorities where appropriate and any colleague may report concerns about modern slavery using our safeguarding reporting system. Our Safeguarding Team provide specialist support and advice to the organisation where required.

## **Recruitment and Selection**

We consider the risk of recruiting individuals who may have been subject to human trafficking to be low. Nonetheless, our recruitment and selection processes include robust measures to confirm eligibility to work in the UK and to complete all necessary pre-employment checks, such as Disclosure and Barring Service (DBS) screening.

We check proof of eligibility to work in the UK for every successful job applicant. This is done via the job application form, followed by verification of relevant documents before final job offers are made.

For roles that require DBS clearance the role clearly states the requirement for DBS and the level of DBS associated with that role. The relevant DBS is undertaken for all offered candidates.

References are routinely taken for new employees covering at least the last two years full employment history and we require a minimum of two references. All pre-employment checks, including the Right to Work in the UK, qualification checks, interview notes, evidence of recruitment and budget approval are signed off by a member of our People Services Team prior to a final offer of employment being made.

## **Whistleblowing**

We have a Whistleblowing Policy and Procedure in place to enable anyone working directly for us or indirectly within our supply chain to raise concerns, in confidence, about any criminal offences including modern slavery or human trafficking.

Our 'Speak Out' process, which we launched in 2023 continues to be well used by colleagues, who are actively encouraged to report anything which causes them a concern. Reports can be made anonymously. This includes concerns about a tenant, a property, a colleague, an internal process or any poor practice. Each reported case is recorded, investigated and any required actions tracked through to completion.

## **Procurement and Supply Chains**

We are committed to ensuring that our suppliers adhere to the highest standards of ethics and ensure that our contracts make it clear that serious violations of our policies will result in termination of the business relationship.

CGA ensures formal tendering activities are in accordance with legislative and ethical requirements. This considers modern slavery to ensure that to the best of our knowledge, the companies we procure supplies and services from are ethically responsible and that they pay the Living Wage. Our suppliers are required to comply with the Modern Slavery Act 2015 and, where appropriate, to follow our policies. Our approach to procurement is documented in our Financial Regulations and Procurement Guide. Anyone bidding for work must confirm that they comply with the Modern Slavery Act 2015 as part of the tender process.

All suppliers and contractors, with a spend value greater than £10,000, are required to complete an annual Supplier Contractor Questionnaire. The questionnaire asks suppliers to provide a copy of their Modern Slavery Policy, setting out how they ensure that slavery and human trafficking is not taking place in any part of their company and supply chain. The questionnaire responses are reviewed, and any queries are picked up with individual contractors to give us confidence that our suppliers are taking action to tackle modern slavery, but it is recognised that this does not completely mitigate the risk.

### **Review and Publication**

This statement will be reviewed annually by the Parent Board and published on the CGA website and the Government modern slavery registry.

This statement was approved by the CGA Board on 2<sup>nd</sup> October 2025.