

# Modern Slavery Statement

#### Introduction

It continues to be a priority for Trust Housing Association Ltd and Trust Enterprises Limited to ensure that there are no instances of modern slavery or human trafficking in our supply chains or in any part of our business.

#### Our business

We are an organisation who care. We're here to make a positive difference to the lives of our customers and the communities we serve. Our customers and communities are at the heart of everything we do, and our services are very people focused. As such, we are a large employer with over 720 full and part-time employees working across Scotland.

#### Code of conduct

Trust attaches the greatest importance to ensuring that high standards of behaviour are demonstrated by all of our people and in all of our activities, these high standards are set out in our Employee and Governing Body Members Code of Conduct<sup>1</sup>.

### Safeguarding

Our Safeguarding Policy<sup>2</sup> sets out clear procedures to identify and report cases of individuals at risk of harm.

#### Whistleblowing

Trust's Whistleblowing Policy<sup>3</sup> supports anyone working for us or with us to raise, in confidence, any concerns of wrongdoing by the organisation. Concerns can be raised internally with managers or any of the following alternative contacts –

- Chief Executive
- Any other Director or member of the Leadership Team
- Head of People & OD
- People Manager or People Partner

<sup>&</sup>lt;sup>1</sup> HR004 - Employee Code of Conduct Policy.pdf; CE010 - Code of Conduct for Governing Body Members Policy.pdf

<sup>&</sup>lt;sup>2</sup> CS027 - Safeguarding and Child Protection Policy.pdf

<sup>&</sup>lt;sup>3</sup> HR021 - Whistleblowing Policy.pdf

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#### Procurement and supply chains

We understand that the construction industry is a higher risk area for modern slavery. As part of the process for procuring our contractors, consultants, and all suppliers they are required to agree to Trust's Supply Chain Code of Conduct supply-chain-code-of-conduct.pdf.

All contractors and suppliers procured under regulated procurement processes provide details of their fair working practices by way of a weighted and scored tender quality question in line with the Scottish Government policy. They are also required to confirm that they have no criminal convictions and no conviction relating to child labour and other forms of trafficking in human beings under the Human Trafficking and Exploitation (Scotland) Act 2015 through the mandatory Single Procurement Document. In addition, they are required to confirm that they have not breached employment law obligations.

## Employees and other workers

We treat all our colleagues and workers fairly, and with respect. We have robust measures in place to ensure this, including:

- Processes to verify prospective employees' identities and their right to work in the UK.
- Paying at least the Scottish Living Wage and providing a range of core employee benefits.
- Offering a free external counselling service and access to a trained team of internal mental health supporters.
- Engaging agency workers from reputable employment agencies. As part of the Agency Terms of Business, we outline our expectations which include the agency workers' right to work in the UK.
- In 2024 Trust became a Scottish Government Fair Work First Employer.

#### Our commitment to drive continual improvement

We remain committed to ensuring that there are no instances of modern slavery or human trafficking within our supply chains or in any part of our business.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial year ending 31 March 2025

Dr Norval Bryson, Chair

MM Bga

Rhona McLeod, Chief Executive