
Modern slavery

Introduction by Andrew Hall

We recognise the detrimental effect modern slavery has on global society and we have adopted a zero-tolerance approach. We are committed to acting ethically and with integrity in all our business dealings and relationships to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

The Cottsway Group is proud of the steps we have taken to combat slavery and human trafficking and we are committed to improving our practices in this area.

This Modern Slavery Statement outlines the steps we have taken to eliminate this, as well as our approach during the 2024/ 2025 financial year, and the steps we will take in the future as far possible. It is made pursuant to section 54(1) of the Modern Slavery Act 2015.

About us

We are a registered provider of social housing in England, and we are the largest housing association in West Oxfordshire. We provide around 5,800 homes for rent and shared ownership homes in the district as well as in Gloucestershire, Wiltshire, and Worcestershire. Our homes range from flats and bungalows to family homes.

We have around 178 employees providing services including:

- Tenancy Support through our Customer services Teams
- Repairs and Maintenance including ensuring safety in our homes.
- New -build homes and developing homes in the Community.
- Supporting our internal and external customers to ensure Cottsway is a safe and rewarding place to work.

The ultimate parent of Cottsway Group is Cottsway Housing Association. Cottsway's subsidiary companies are Cottsway2, Cottsway Treasury Plc (dormant) and West Oxfordshire Housing (dormant).

The Group's turnover for 2024/25 was £45.7m.

More information about who we are, our vision and values, as well as our Board and Management Team can be found on the [Cottsway website](#).

Our supply chains.

As a registered provider we do not operate extensive, worldwide supply chains. Due to this, we can build close relationships with suppliers who share our values and our commitment with regards to tackling slavery and human trafficking.

As part of our contracting processes, we include specific prohibition against the use of:

- forced, compulsory or trafficked labour; or
- anyone held in slavery or servitude.

We expect our suppliers to hold their own suppliers to the same high standards.

All our contracts are managed by individual contract managers, and we believe we have a low risk of exposure to acts of modern slavery because:

- apart from larger banks/lenders that we work with, most of our supply chains are based in the UK and many of them are local suppliers who we work closely with; and
- we operate solely within the UK within the social housing sector, with simple financial transactions and business partnerships.

Our procurement process.

We are, however, aware that construction work is more susceptible to modern slavery. To ensure all those in our supply chain comply with our values and our commitment to combatting modern slavery, we have in place a supply chain compliance programme. All our contracts are tendered in line with our Financial Regulations and Procurement Policy. Any suppliers we choose to work with undergo a comprehensive assessment process prior to appointment to ensure they meet our specific procurement criteria.

If we spend more than £5,000 per annum with a supplier, they must:

- provide us with a copy of their Modern Slavery declaration (if their turnover exceeds £36m); or
- agree to follow our Modern Slavery Statement (if their turnover does not exceed £36m)

If the supplier chooses not to do this, they will be excluded from our tender process and/or any work with us.

Our recruitment process.

- Our recruitment and people management processes ensure that all prospective employees are legally entitled to work in the UK and that staff are safeguarded from any abuse or coercion once in our employment.

If we use a recruitment agency, we will:

- Only use agreed specified, reputable recruitment agencies.
- Expect the agency we use to be:
 - Fully compliant with the MSA 2015
 - Free from ethical ambiguities
 - Transparent, accountable, and auditable.

- End our contract with any agency that we believe has failed to meet the above standards.

Policies relating to slavery and human trafficking.

We are committed to ensuring that there is no modern slavery in our supply chains or in any part of the organisation. As part of this, we have introduced a Modern Slavery and Human Trafficking Policy which reflects our commitment in acting ethically and with integrity in all our business relationships.

Also, to support this we have the following policies in place:

- Anti-social behaviour policy
- Board and employee codes of conduct
- Domestic abuse policy
- Equality, diversity, and inclusion policy
- Procurement policy
- Safeguarding adults and safeguarding children and young people policies
- Various HR policies – including confidential reporting and dignity at work.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk, we have in place systems to:

- identify and assess potential risk areas in our supply chains.
- mitigate the risk of slavery and human trafficking occurring in our supply chains.
- monitor potential risk areas in our supply chains; and
- protect whistle blowers.

Our effectiveness in combating slavery and human trafficking

We use the following performance indicators (PIs) to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our organisation or supply chains:

- recording and monitoring any incidents or reports made to us by staff in accordance with our Modern Slavery and Human Trafficking Policy.
- monitoring any incidents or allegations across our supply chains which conflict with our values.
- recording any incidents or complaints received from any third parties concerning slavery and human trafficking.

Raising awareness

Staff training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our organisation and our supply chains, all staff are required to complete adequate Modern Slavery training. This includes:

- what to do if they suspect modern slavery is present either within one of our communities or in the supply chain; and
- the external help available, including information about the Modern Slavery Helpline

Future actions

During 2025/26 we intend to take the following further steps to combat slavery and human trafficking:

- continuous monitoring of our business and its supply chains to ensure we are free from slavery and human trafficking.
- continuing to require our contractors and supply chains to act in accordance with our Modern Slavery and Human Trafficking Policy when dealing with us; and
- ongoing education and promotion of our Modern Slavery and Human Trafficking Policy along with a training program to ensure our staff understand and adopt our values.

Approved by the Cottsway Housing Association Board on 5 August 2025
Signed off by Andrew Hall, Chair of Cottsway Housing Association.