

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT 2022-23



1. Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and set out the steps that Rochdale Boroughwide Housing (RBH) has taken and continues to take to ensure that modern slavery and human trafficking is not taking place within the business or the supply chain.

Our Business

Rochdale Boroughwide Housing is committed to ensuring that the Society is run on sound moral principles and values. The principles and objectives of the Modern Slavery Act are intrinsically linked to RBH's values-led approach and are reflected in the priorities made in 'Succeeding Together', our RBH strategy for 2022 - 2025.

RBH recognises that it has a responsibility to work towards ensuring that modern slavery and human trafficking does not form any part of our business or of our supply chains.

RBH also understands the need to use our influence and to work effectively with key partners to eliminate modern slavery and human trafficking in our communities. To achieve this RBH implements a number of processes and controls, to ensure there is transparency within our own business and in our approach to procuring contractors, suppliers and business partners.

Purpose

Modern Slavery is a crime and a violation of fundamental human rights, and it can take various forms.

- Slavery or servitude
- Forced and compulsory labour
- Human Trafficking
- Sexual Exploitation
- Securing service by force, threats and deception

All of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Organisational Structure

RBH is the UK's first tenant and employee co-owned mutual housing society, with 12,785 homes throughout the local area. The Group structure includes RBH (Design and Build) Limited, a registered company that undertakes new build development on behalf of RBH and RBH Professional, a registered company which is currently dormant.

Drawing on the area's rich co-operative heritage, our unique model places members at the heart of decision-making, allowing everyone to enjoy a sense of security and belonging in places we make great together.

Being part of the co-operative and mutual movement, RBH is, of course, aligned with the international co-operative principles and has an agreed set of values which complement our obligation and commitment regarding modern slavery and human trafficking.

2. Our Supply Chain

RBH procures a wide variety of goods and services from a diverse range of suppliers. These include;

- Newbuild and regeneration development contractors and suppliers
- Services relating directly to our homes and properties, i.e. construction and maintenance
- IT and communication equipment services
- Various professional services
- Office equipment and supplies
- Temporary/agency staff
- Consultancy Services

Further details of the society's supply chain can be requested from the Procurement Team.

The RBH Procurement Strategy was approved and published in March 2021. In the strategy, the key objective of (5.4) "Ensuring Fair and Ethical Trading" contains a section specifically on modern slavery, and how we will adopt practices to ensure we, and in particular our supply chain, meet the requirements of 'The Modern Slavery Act 2015'.

As part of the selection questionnaire included in the tender documents for a prospective new contract, potential providers are asked the following;

- Are you a relevant commercial organisation as defined by section 54 ("Transparency in supply chains etc.") of the Modern Slavery Act 2015?
- If you have answered yes to the question above, are you compliant with the annual reporting requirements contained within Section 54 of the Act 2015?
- If you have answered no to the question above, please provide a written explanation.

The tender documents make it clear to any potential supplier that if the questions demonstrate that the supplier has committed an offence under Section 2 or Section 4 of 'The Modern Slavery Act 2015' then that will be grounds for mandatory exclusion from that tender process.

3. RBH Employees

Regarding recruitment, all new starters are required to produce original documentary evidence of a right to work in the UK. Successful applicants are provided with an eligibility checklist of documents that RBH will accept as proof. If this cannot be fulfilled RBH do not allow employment to commence.

RBH are an accredited Living Wage Employer. RBH do not operate any zero-hour contracts.

The interests of our employees are further safeguarded by RBH's recognition of two unions, Unison and Unite, with whom we work closely to ensure fairness and equality within the society.

RBH has in place a Whistleblowing Policy and is committed to the highest possible standards of openness, probity and accountability and encourages freedom of speech. All employees are made aware of the policy and where a serious concern exists, about any aspect of the society's work, employees are expected and encouraged to raise their concerns.

RBH has a rolling programme of safeguarding training with all employees, of which modern slavery is one aspect. The society has an established Safeguarding Group and in 2020 introduced the roles of Safer Neighbourhoods Lead and Safeguarding Co-ordinator who provide support to colleagues in raising and reporting safeguarding concerns. RBH also has an established email account to report concerns around Safeguarding – Eyes Wide Open – which all employees have received training on and how to report concerns. When our customer facing employees have identified potential victims a provision of support is offered to the victims and, where appropriate, a referral made to the National Referral Mechanism.

4. RBH Customers

RBH is a partner of choice within the Rochdale Safer Community Partnership, including representation on the Partnership Enforcement Team (PET), which provides a multi-agency response to organised crime. RBH's membership of PET guarantees close links to other key partners should a response be required to issues such as modern slavery or human trafficking.

RBH is mindful of the potential use of its homes for activity which may be linked to slavery or human trafficking. RBH seeks to safeguard applicants who apply for an RBH home by carrying out a series of eligibility and identity checks at the point of application.

RBH works closely with partner agencies including the police and probation services and participates in multi-agency meetings to ensure that any potential vulnerabilities or issues of concern are discussed at the point of application. Where vulnerabilities are identified these are highlighted on customer records using a series of vulnerability indicators.

RBH seeks to protect victims and ensures that due consideration is given to the circumstances of an individual's involvement in criminal or anti-social activity, for example where there is/are;

- enforced or coerced production of drugs
- controlling of a tenancy for the purpose of selling and/or supplying drugs
- persons being forced or coerced into prostitution

RBH recognises the importance of preventing, detecting, and tackling unlawful subletting, tenancy misuse and tenancy fraud, and has a zero-tolerance approach to this. RBH understands and acknowledges the potential links that may exist between, these themes and modern slavery and human trafficking. All incidents of unlawful subletting, tenancy misuse and tenancy fraud are investigated, and appropriate action taken to resolve the issue.

5. Thematic Links with other Documents

- Purchasing Policy
- Recruitment and Selection Policy
- Whistleblowing Policy
- Safeguarding Policy
- Tackling Unlawful Subletting and Occupancy Policy
- Anti-Social Behaviour Policy
- Procurement Strategy 2021-2024

6. Declaration

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. The statement constitutes RBH's Modern Slavery and Human Trafficking Statement for the financial year ending 31st March 2023.



S2022/05

Signed: A Tumilty, Board Chair



S2022/05

G Swarbrick, Chief Executive

Date: 11 August 2022