

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT



1. Introduction

As a registered social landlord, Rochdale Boroughwide Housing (RBH), believe in, and are committed to, running our business responsibly and equitably.

RBH recognises and understands 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. In order to achieve this RBH implements a number of processes and controls, and is committed to ensuring there is transparency within our own business and in our approach to procuring contractors, suppliers and business partners.

2. Organisational Structure

RBH is the UK's first tenant and employee co-owned mutual housing society, with over 13,500 homes throughout the local area. In addition to the registered provider, RBH, the Group includes RBH (Design and Build) a registered company that undertakes new build on behalf of RBH, and RBH Professional, a registered company which is currently dormant and a Joint Venture.

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 compliment our obligation and commitment regarding modern slavery and human trafficking.

3. Our Supply Chain

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

- Services relating directly to our properties, i.e. construction and maintenance
- IT and communication equipment services
- Various professional services
- Office equipment and supplies
- Temporary/agency staff

Within RBH's supply chain, 99.99% of our suppliers are UK based, a fact which we believe assists us in reducing the risk of modern slavery or human trafficking being present anywhere in our business.

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

The new RBH Procurement Strategy document was approved and published in January 2017. In the strategy, the key objective of "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.

4. RBH Employees

With regard to 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. We pay the minimum wage if aged 16 to 24 or the Government's living wage rate if aged 25+ for trainees who are employed on a 12 month contract. 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.

Throughout 2017/18 RBH are continuing with a rolling programme of safeguarding training with all employees, of which modern slavery is one aspect. The society has an established group of Nominated Safeguarding Officers (NSO) who provide support to colleagues in raising and reporting safeguarding concerns. The NSOs will work with frontline officers in; identifying potential victims, provision of support to the victims and, where appropriate, referral to the National Referral Mechanism.

5. RBH Customers

RBH are 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 housing stock for activity which may be linked to slavery or human trafficking. RBH manages the Choice Based Lettings scheme on behalf of Rochdale BC and seeks to safeguard applicants who apply for either an RBH home or home with another Registered Provider 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.

RBH manages the statutory homelessness assessment and temporary accommodation services on behalf of Rochdale BC and as such plays a key role in responding to any suspected incidents around modern slavery and trafficking where urgent rehousing may be required.

6. Thematic Links with other Documents

- Purchasing Policy
- Recruitment and Selection Policy
- Whistleblowing Policy
- Safeguarding Adults Policy
- Safeguarding Children Policy
- Tackling Unlawful Subletting and Occupancy Policy
- Anti Social Behaviour Policy

7. 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 2017.



Gareth Swarbrick
Chief Executive
31 May 2017



Noel Chambers
Chair of the Board
31 May 2017