

Modern Slavery & Human trafficking Statement 2026-2027

1. Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Rochdale Boroughwide Housing Limited (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. The statement applies to all the companies in the RBH Group - The Group structure includes RBH (Design and Build) Limited, a registered company that undertakes new build development on behalf of RBH and RBH Professional.

Our Structure and Business

RBH is the UK's first tenant and employee co-owned mutual housing society, with over 12,000 homes throughout the Borough of Rochdale. It is a charitable registered society under the Co-operative and Community Benefit Societies Act 2014 and a registered provider of Social Housing with the Regulator of Social Housing.

Being part of the co-operative and mutual movement, RBH is 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.

RBH 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 our 2025-28 Corporate Strategy 'Building foundations for people to Thrive'.

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

RBH also understands the need to use our influence, and to work effectively with key partners and stakeholders, to eliminate modern slavery and human trafficking in our communities. To achieve this RBH implements 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 labor
- Human Trafficking
- Sexual Exploitation
- Securing service by force, threats and deception

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

2. 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 homes and properties, i.e. regeneration 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.

Our Procurement Strategy for 2024–2027 was approved and published in March 2024. In the strategy, sections 5.6.10 and 5.5.11 directly relate to 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'.

RBH recognises that modern slavery risks are more likely to arise in:

- Construction and regeneration supply chains.
- Repairs and maintenance contractors.
- Agency and temporary labour providers.
- Cleaning and facilities management services.
- Procurement of goods manufactured overseas.

We address these increased risks by enhanced due diligence and contact management and by means of prospective suppliers by confirming that the organisation is subject to the Modern Slavery Act 2015 under section 54 and their compliance with the requirements of section 54 by providing evidence for verification. In all cases RBH undertakes proportionate due diligence on suppliers regardless of whether suppliers are covered by the requirements of the Act or are legally required to produce a Modern Slavery Statement.

The Procurement Team will support this requirement by the inclusion of relevant questions in its tender documentation and pre-qualification questionnaire documents, requiring suppliers to demonstrate their own policies that meet the requirements of the Modern Slavery Act 2015.

3. RBH Employees

All new starters are required to produce original documentary evidence of their 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, transparency 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 Officer and a safeguarding reporting process managed by colleagues across the Customer and Communities Directorate to assist in raising and reporting safeguarding concerns. It is covered 5 days a week by managers and the Safeguarding Officer. Anyone from across RBH who has a concern can use this reporting process to report a safeguarding concern.

When our customer facing employees have identified potential victims of Modern-Day Slavery and Human Trafficking, 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 supports 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 indicators for any reasonable adjustments to be made.

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 developed robust procedures with colleagues from Rochdale Borough Council Fraud Team to assist with this approach. 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 Policy
- Whistleblowing Policy
- Safeguarding Policy
- Tenancy Policy
- Lettings Policy
- Anti-Social Behaviour Policy
- Domestic Abuse Policy
- Procurement Strategy 2024-2027

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 2027. This statement was approved by the Board of RBH on 22 July 2026 and is signed on its behalf by the Chair of RBH.

Signed:

A handwritten signature in black ink, appearing to be 'Larry Gold', written over a light blue horizontal line.

Name: Larry Gold

Position: Interim Chair of the Board

Date: 22 July 2026