

Modern Slavery & Human trafficking Statement 2024-25



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 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, a registered company which is currently dormant.

Our Structure and Business

RBH is the UK's first tenant and employee co-owned mutual housing society, with 12,420 homes throughout the local area. 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, 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.

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 2024-25 Corporate Strategy of 'Delivering for our customers and communities'.

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 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.

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.

Our Procurement Strategy for 2024–2027 was approved and published in March 2024. In the strategy, section 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'.

We do this by minimising risk to Modern Slavery 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.

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 Group and Safeguarding Lead with Safeguarding Champions meeting with colleagues across RBH to assist in raising and reporting safeguarding concerns.

Work has continued to take place in 2023-24 to enhance our reporting for concerns for Safeguarding and in December 2023 a new Safeguarding Duty Line called 'if in doubt shout it out' was introduced with an internal telephone line which is covered 5 days a week by members of our Tenancy Sustainment and Safeguarding teams. Anyone from across RBH who has a concern can ring the number for advice and/or escalation.

The previous safeguarding reporting system known as 'eyes wide open' was decommissioned and all non-safeguarding housing management requests are now submitted using digital neighbourhood forms.

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 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

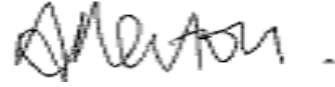
- Purchasing Policy
- Recruitment and Selection Policy
- Whistleblowing Policy
- Safeguarding Policy
- Tenancy Policy
- Lettings Policy
- Anti-Social Behaviour Policy
- Domestic Abuse Policy
- Procurement Strategy 2024-2027

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 2025.

Signed: 

Kevin Brady
Board Chair



Amanda Newton
Chief Executive

Date: 24 July 2024

8 August 2024