

## **Anti-Slavery and Human Trafficking Statement**

### **November 2019**

Rooftop Housing Group (RHG) is a not for profit organisation with approximately 6000 affordable homes mainly in Worcestershire and Gloucestershire. We also develop housing for rent and sale. We aim to promote the highest standards in how we run our business and in our employment, tenancy and procurement practices. RHG, and our subsidiaries, support the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

This Statement summarises our approach and the actions we have already taken and intend to take within the next year, in our own company and in our supply chain.

### **Organisational Structure**

Rooftop Housing Group (RHG) comprises Rooftop Housing Association (RHA) and Rooftop Homes Limited (RHL).

Rooftop Housing Group (RHG) is the parent organisation. The parent and subsidiaries RHA and RHL are registered as Registered Societies regulated by the Regulator of Social Housing.

We are much more than just a landlord and between our businesses, we incorporate traditional housing provision, sheltered or extra care housing, supported housing for special needs and accommodation for Key Workers.

The Group's main area of operation is in Worcestershire and Gloucestershire, but we do have homes in other areas.

Within RHG, our recruitment and people management systems are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion once in our employment.

Our housing management policies and procedures support a robust approach to confirming the identity of any new tenants and the prevention of tenancy fraud. This is supported by our safeguarding and whistleblowing policies.

RHG has an extensive supply chain and we procure goods, services and works from a wide range of different suppliers and partners. Some of our suppliers subcontract work or rely on recruitment agencies to supply temporary or permanent staff. By the nature of their businesses, some of our suppliers are potentially at higher risk than others, for example: maintenance, repairs and construction companies.

### **Relevant policies**

The Group operates the following policies:

**Procurement Policy:** RHG is committed to ensuring that its suppliers adhere to the highest standards of ethics as part of the procurement process. Larger suppliers are required to confirm that they carry out documented risk assessments of their business and supply chain to ensure continuous compliance with statutory requirements and provide it as part of the tender submission document.

**Recruitment Policy:** RHG will undertake all relevant pre-employment checks prior to staff being employed. We will carry out fair and transparent recruitment processes and will ensure our recruitment agencies comply with these requirements in the provision of agency staff. We strive to maintain the highest standards of employee conduct and ethical behaviour in delivering our services and managing our supply chain. The Employee Code of Conduct sets out the behaviours expected of our employees when representing RHG.

**Whistleblowing Policy:** RHG is committed to the highest standards of quality, probity, openness and accountability and, as part of this commitment, provides a method for individuals to report any activity that would be considered to be illegal, unethical or dishonest and for those issues to be dealt with fairly, consistently and as quickly as possible.

**Equality and Diversity Policy:** RHG values diversity and will seek to achieve equality of treatment and access for customers, staff, and board members. We strive to ensure we do this without discrimination or prejudice on the grounds of any of the protected characteristics. The principles of the Modern Slavery Act will be monitored as part of the equality and diversity policy.

Our commitment to the Modern Slavery Act 2015 is demonstrated by:

- Ensuring that this statement is made available to our employees and customers via our website
- Informing our employees, via the Whistleblowing policy of how to report any activity that would be considered to be illegal, unethical or dishonest.
- Training relevant roles on the Modern Slavery Act 2015
- Reflecting the Modern Slavery Act 2015 within relevant policies
- Checking that suppliers of temporary staff are committed to the principles of the Act.
- As part of the tendering process, requiring suppliers to complete a declaration regarding their compliance with the principles of the Modern Slavery Act.
- The tendering of new contracts over £50k will include an obligation that suppliers comply with the Modern Slavery Act 2015. Organisations with a turnover of more than £36 million will be required to provide a copy of their Slavery and Human Trafficking Statement. Smaller contractors will be asked to adopt the RHG Statement.

This Statement is approved by the Rooftop Housing Group Executive Team and the Group Board and applies to all organisations within the Group. It will be reviewed and updated on an annual basis.



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Nicola Inchbald  
Chair of Rooftop Housing Group Limited

Updated November 2019