

Anti-Slavery and Human Trafficking Statement

November 2018

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, and 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 Weston Super Mare, Shrewsbury and Nuneaton.

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 process to sign up new tenants is set up so that we undertake a robust procedure to ensure their identity which includes background and photo identification checks. We also undertake a minimum of two visits a year to new tenants and one contact with other residents to ensure that we know the tenants in our properties. Housing Management staff keep an eye on any external issues or changes with our properties and tenants, and we always investigate any allegations from residents or the wider community regarding potential tenancy fraud. We belong to two tenancy fraud forums: Mercian (covering Worcestershire and Herefordshire) and Gloucestershire, in partnership with other RPs and local authorities.

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.

We have amended our procurement policy to reflect the Modern Slavery Act 2015 and have undertaken a number of activities during the past 12 months to support our commitment to the principles of the Act:

- Made our staff, residents and leaseholders aware of the Modern Slavery Act 2015, including the definitions of slavery and human trafficking through training sessions.
- Informed staff what to do if they suspect a case of slavery or human trafficking.
- Contacted our current suppliers who provide us with temporary staff to ensure they also comply with this Act.
- Contacted suppliers in potentially higher risk categories to check what assurance arrangement they have in place.
- Reviewed and amended our Whistleblowing policy to include raising concerns in relation to the Modern Slavery Act 2015.
- Published this Statement on our company website.

Relevant policies and strategies

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. Suppliers are required to demonstrate that they provide safe working conditions, treat employees with dignity and respect and comply with relevant employment legislation.

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.

Due Diligence

Going forward, RHG will implement the following actions to mitigate the risk of slavery or human trafficking in the delivery of its services and supply chain:

- All existing suppliers will be asked to provide evidence of compliance with the principles of 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.
- The tendering of new contracts will include an obligation that suppliers comply with the Modern Slavery Act 2015.
- To ensure an understanding of the potential risks of modern slavery and human trafficking in delivering our services and managing our supply chain, we will provide ongoing awareness to new members of staff as part of their induction process.
- Where appropriate we will include reference to the Modern Slavery Act 2015 in our policies and procedures.

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.



.....
Nicola Inchbald
Chair of Rooftop Housing Group Limited

Updated November 2018