

# Anti-Slavery and Human Trafficking Statement - Modern Slavery Act

November 2024

Rooftop Housing Group (Rooftop) is a not-for-profit organisation with approximately 7000 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.

Rooftop, 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 within Rooftop and in our supply chain.

## Operating environment

Rooftop currently has one active subsidiary, Rooftop Housing Association. Rooftop Housing Group is the parent organisation. The parent and subsidiary 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 and accommodation for Key Workers.

Our main area of operation is in Worcestershire and Gloucestershire, but we do have homes in other areas.

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 them 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.

We have 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 workers.

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

**Procurement Policy:** We are committed to ensuring that suppliers adhere to the highest standards of ethics as part of the procurement process. Suppliers are required to evidence that they comply with statutory requirements, including compliance with the Modern Slavery Act 2015, the Procurement Act 2023 and Rooftop's Supplier and Contractor Code of Conduct.

**Recruitment Policy:** We undertake all relevant pre-employment checks prior to people being employed. We carry out fair and transparent recruitment processes and will ensure our recruitment agencies comply with these requirements in the provision of agency workers. We strive to maintain the highest standards of conduct and ethical behaviour in delivering our services and managing our supply chain.

The Colleague Code of Conduct sets out the behaviours expected of our colleagues. The Supplier and Contractor Code of Conduct sets out the behaviours expected of those working on our behalf.

**Whistleblowing Policy:** We are committed to the highest standards of quality, probity, openness, and accountability and, as part of this commitment, provide 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, Diversity and Inclusion Policy:** We value diversity and will seek to achieve equality of treatment and access for customers, colleagues and Board Members. We strive to ensure we do this without discrimination or prejudice on the grounds of any of the protected characteristics.

### **Commitment**

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

1. Ensuring that this Statement is made available to our colleagues and customers via our website.
2. All new colleagues and Board Members are required to read our Anti-Slavery and Human Trafficking statement as part of their induction process.
3. Informing our new and existing colleagues, of the Whistleblowing Policy and how to report any activity that would be considered to be illegal, unethical, or dishonest.
4. Training relevant roles on the Modern Slavery Act 2015.
5. Reflecting the Modern Slavery Act 2015 within relevant policies.
6. Checking that agencies who supply temporary workers are committed to the principles of the Act.

### **Due Diligence**

The tendering of new contracts 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 Rooftop Statement. This Statement is approved by the Executive Team and the Group Board. It will be reviewed and updated on an annual basis.



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Sally Higham  
Chair of Rooftop Housing Group Limited  
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