

# Modern Slavery and Human Trafficking Statement

Issued: March 2024

## Introduction

As a responsible employer and business, and as an organisation dedicated to improving the lives of our residents and the communities we serve, RHP Group is committed to doing everything we can to prevent slavery and human trafficking. This statement sets out how we deliver that commitment, understanding and mitigating the risks of slavery or human trafficking taking place within our business or supply chain, and demonstrating compliance with the Modern Slavery Act 2015 (the Act).

## Who are we?

We provide safe, secure, affordable homes – opening the door to life opportunities. Our key activities focus upon West and South West London. We were formed in 2000, and over the years have gradually extended our reach. Today we operate across the boroughs of Richmond, Hounslow, Kingston and Hillingdon. We provide housing for rent, principally for individuals and families who are unable to rent or buy on the open market, and also provide supported housing for people who need additional housing related support.

We own or manage 11,000 properties, including 2,000 properties where a long lease has been sold and 169 shared ownership properties. 85% of our income is derived from social housing lettings.

This statement has been prepared to cover the activities of RHP, and its subsidiaries as set out below:

1. Co-op Homes (South) Ltd, a subsidiary, is also a Registered Charitable Community Benefit Society, owns a small portfolio of homes and provides a comprehensive management service to Co-ops predominantly in London and the South East
2. RHP Finance plc, a subsidiary, was established to raise funds from the capital markets for the Group.
3. RHP Develop Ltd, a subsidiary, is a development vehicle.
4. RHP Home (Repairs) Ltd, a subsidiary which carries out reactive repairs to our properties.

## Overall approach

We are committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

We consider our greatest risk of slavery and human trafficking to be in the sourcing of our supply chains when undertaking procurement activities.

We have zero tolerance to slavery and human trafficking and expect all our contractors to comply with our values. We use contractors that are UK based only.

## Current mitigation activities

We believe the risk of slavery and human trafficking within our organisation is avoided and mitigated by our policies and procedures together with our approach to considering taking on new suppliers.

### a) *Relevant Policies*

The following summary of these policies outlines our approach to modern slavery risks and what steps should be taken to prevent slavery and human trafficking in our operations:

- **Whistleblowing policy** - We encourage all our employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for individuals to make disclosures, without fear of retaliation.
- **Code of Conduct** - Our code makes it clear to employees, Board Members and Involved Customers the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of conduct and ethical behaviour when operating and managing our supply chain. This includes provisions against bribery, and requirements in relation to workplace behaviour and equality and diversity.
- **Recruitment Policy** – We will only use specified, reputable employment agencies to source applicants and will always verify the practices of any new agency before accepting workers from that agency. We require all employees to provide verified documents, such as a valid passport, before they start their employment to confirm their legal right to work in the UK.
- **Pay Policy** – We are committed to paying fair and competitive salary levels. We're proud to be a London Living Wage Employer.

### b) *New suppliers*

We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. Our due diligence and reviews include:

- Compliance checks for any sanctions or law enforcement issues experienced by the company or its directors.
- Requesting and reviewing suppliers own Modern Slavery and Human Trafficking Statements.

## Additional activities for the upcoming financial year

We have identified a few areas where we believe we can strengthen how we avoid and/or mitigate the risk of slavery and human trafficking within our organisation over the coming 12 months. These are summarised below:

- **Training for our employees**

It has been a number of years since we last trained our employees on modern slavery. We will include this as part of our mandatory training programme for 2024/25.

- **Awareness raising**

We'll also raise awareness of modern slavery issues by using our internal communication channels to shine a light on the subject. This will cover how we can identify signs of modern slavery during home or scheme visits, what employees can do to flag potential slavery or human trafficking issues and what external help is available.

- **Review of relevant policies**

There are a number of policies that are due to be reviewed in 2024/25 so we will make sure there is an explicit link to our commitment relating to avoiding the risk of slavery and human trafficking. This includes the People policies and in particular the Recruitment Policy.

- **Roll out of Contract Managers Toolkit**

We have developed a suite of forms and guidance to further assist our contract managers in ensuring best practice for contract management including the need to obtain annual assurance of key documents that are provided at the stage of onboarding a new supplier this will include positive confirmation from contractors that they have continued to carry out checks to address risks of Modern Slavery such as confirmation of right to work for employees.

### **Approval**

This statement was approved by our Board in March 2024.

Signed:  \_\_\_\_\_

Name: Keith Jenkins, RHP Group Chair

Date: 21 March 2024