



**THE COMMUNITY HOUSING GROUP LIMITED**

# **MODERN SLAVERY AND HUMAN TRAFFICKING**

## **2019-20 Statement**



**THE COMMUNITY  
HOUSING GROUP**

## Our Priorities and Values

**Provide affordable homes and services and places where people want to live and work**

## Our Commitment

The Community Housing Group Ltd is a Housing Provider, registered with the Regulator of Social Housing. We provide housing, care, property, training and community services to tenants, residents and commercial organisations in England & Wales through a network of charitable and commercial subsidiaries.

The Group consists of four subsidiaries: Vestia Community Trust, Worcestershire Telecare (trading as amica24), Oakleaf Commercial Services and Wyre Forest Land Company. Service delivery within the Group is governed and controlled by a series of intra group agreements.

We are a living wage employer and have adopted the rate set by the Living Wage Foundation across our Group.

Our shared priorities and values are set out below



We are absolutely committed to preventing slavery and human trafficking in all our corporate activities, and to ensuring that those we work with have the same approach and we would not work with any organisation whose approach or practices are incompatible with our own.

We recognise that there is potential for our customers to be affected by modern slavery and we have policies and procedures in place to ensure that employees are vigilant to the risks for those who are vulnerable within our sector and business.

This statement sets out our actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business, partnerships or our supply chains.

The statement relates to actions and activities during the financial year 1 April 2019 to 31 March 2020 and sets out our plan for 2020/21

All relevant strategies, policies and procedures are regularly updated to reflect best practice and regulatory requirements.

We work in the following regions: Wyre Forest, Worcestershire, West Midlands, Staffordshire, Gloucestershire and South/East Wales London, Oxfordshire and Hampshire.

## **Our organisational structure, partners and supply chains**

**The Community Housing Group (The Group)** is a social business and one of Worcestershire's largest Registered Providers (RP) of social housing. The Group provides and manages general needs and supported housing and a range of associated services. It is an exempt charity and registered society under the Co-operative and Community Benefit Societies Act 2014.

**Worcestershire Telecare (WTC) operating name amica24** is an exempt charity trading as amica24 and registered society under the Co-operative and Community Benefit Societies Act 2014. WTC provides a range of technology enabled care solutions linked to a state of the art 24-hour monitoring and response centre. The service provides peace of mind for service users, their families, friends or carers, knowing that help is available day or night, 365 days of the year.

**Oakleaf Commercial Services (OCS)** is a company limited by shares (all of which are held by The Community Housing Group). OCS provides high quality building maintenance, development, grounds maintenance services, joinery and manufacturing of doors and windows for a portfolio of customers across the West Midlands and surrounding counties.

**Vestia Community Trust (VCT)** is an exempt charity and registered society under the Co-operative and Community Benefit Societies Act 2014. VCT was established as part of The Community Housing Group to focus on working in partnership with others to pilot new ways of working for the benefit of the Group and its customers, work with partners to secure external funding to deliver social and economic inclusion within Worcestershire and manage and deliver employee learning and development programmes within the Group.

Wyre Forest Land Company is a Company limited by shares all of which are owned by The Community Housing Group. Its principle function is property development.

### **Combined, we work with the following partners:**

Our tenants; leaseholders; shared owners; service users; Wyre Forest District Council; Our Funders; Housing providers – Local Authority, Registered Providers and Private Companies; Local and National Government organisations; Other Statutory organisations: Police, Fire, Health, Ambulance, Probation, Health, Clinical Commissioning Groups.

Voluntary, Community and Charitable organisations; Care agencies/carer agencies; Job Centres; Schools & Colleges; Skills Funding Agency; Big Lottery, Local Enterprise Partnerships; Advance IT – lone worker services and platform.

We have long term partnerships with local and national businesses for the provision of Materials; Fleet Maintenance; Scaffolding; Decorating; Flooring; Replacement water services; Legionella testing and Asbestos

### **These partners supply the following:**

Office equipment; marketing; training and conferences; legal and consultancy services; post/courier information and communication technology; works to property including building supplies/components; property development/development agency services; equipment/uniform providers; property removals; meals in sheltered schemes; environmental health services; technology enabled care solutions; minor installation of building components; construction services and grounds maintenance services

## Action Plan - Year 4 (1st April 2019 to 31st March 2020)

### Risk mitigation

We have:

- Continued to train all new and existing employees to enable them to identify and report actual or suspected instances of slavery or human trafficking.
- Provided training to contractors and partners through similar e-learning modules and regular contractors workshops
- Continued to ensure all policies consider the implications of modern slavery specifically:
  - Safeguarding Policy
  - Code of Conduct-Contractors
  - Recruitment Policy
  - Procurement Strategy
  - Whistleblowing Policy
- Worked proactively with our supply chain partners to respond to changes in legislation and referenced these at partner seminars and workshops. Our supply chains are drawn mainly from the construction, property maintenance and care and support market.
- Actively used our Property & Person at Risk process to identify any safeguarding issues and suspicions of modern slavery and human trafficking.
- As part of the delivery of the 'Together we Can' business plan we have ensured that there is a consistent and focused approach to modern slavery and human trafficking across the Group.
- Actively encouraged employees to report any concerns relating to our business activities through our Whistleblowing Policy
- Responded to all new guidance and regulatory requirements to ensure we remain compliant with the legal framework.

## Action Plan - Year 5 (1st April 2020 to 31st March 2021)

Through our ongoing commitment we have taken all reasonable steps to avoid there being slavery/human trafficking in our business, partnerships or our supply chains.

We will:

- Continue to comply with guidance and research and adopt best practice
- Continue to work with the County Council Safeguarding Board and follow their guidelines for managing and reporting safeguarding issues.
- Continue to review our package of training for staff and supply chain partners.
- Continue to support our supply chain partners to respond to any changes in legislation.
- Continue to provide assurance of compliance through information published on our website.

**This statement has been approved by The Community Housing Group Ltd who will review and update it annually.**

**Andrew Foster**  
Group Chair

**June 2020**

**Ray Brookes**  
Group Chief Executive

**June 2020**