

— The Community Housing Group Ltd —

MODERN SLAVERY & HUMAN TRAFFICKING

Draft 2017-18 statement



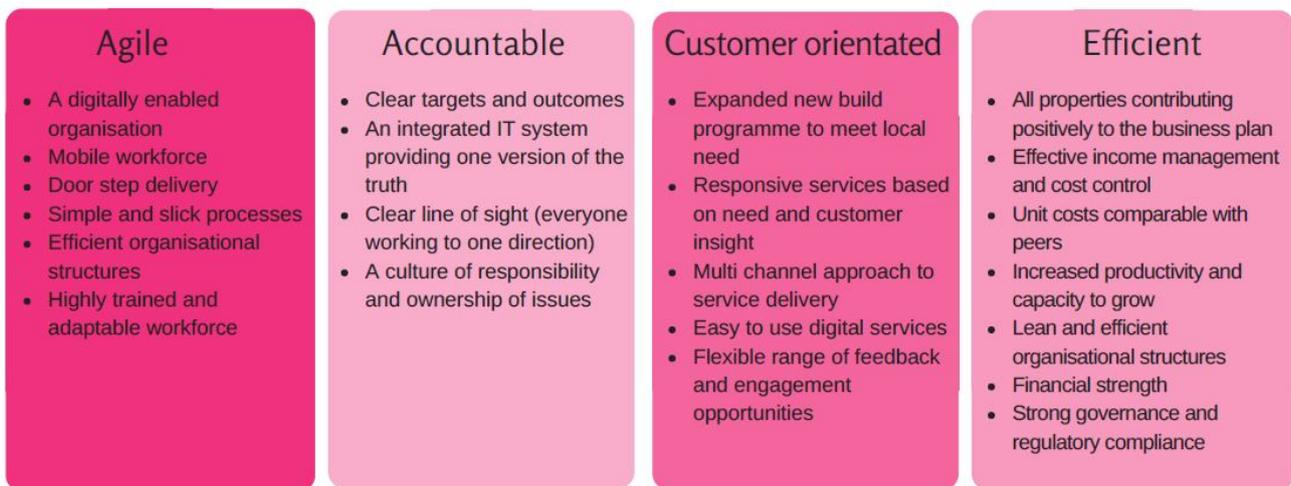
The Community Housing Group Ltd is a Housing Provider, registered with the Regulator of Social Housing. We provide housing, care and support (including assistive technology), property, training and community services to tenants, residents and commercial organisations in England & Wales through a network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

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

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

Our Priorities and Values

Our shared priorities and values are set out below



Our Commitment

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

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 2017 to 31 March 2018 and sets out our plan for 2018/19.

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

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

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 sheltered housing homes for the Group. It is an exempt charity and registered society under the Co-operative and Community Benefit Societies Act 2014.

Worcestershire Telecare (WTC) is an exempt charity and registered society under the Co-operative and Community Benefit Societies Act 2014. WTC provides a range of telecare 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, joinery and grounds maintenance services for the Group and a growing 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 working in partnership with others to pilot new ways of working for the benefit of the Group and its customers, to secure external funding to deliver social and economic inclusion within Worcestershire and manage and deliver employee learning, development and apprenticeship programmes across the Group.

Wyre Forest Land Company (WFLC) is a Company limited by shares. Its principle aim is property development.

We work with our customers and the following partners:

- Wyre Forest District Council
- Our Funders
- Other Registered Housing Providers
- Local Authorities
- 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
- The Skills Funding Agency
- 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
- Asbestos

Our partners supply the following goods and services:

- Office Equipment
- Marketing
- Training & Conferences
- Legal & Consultancy Services
- Post/Courier services
- Information & 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
- Accommodation in relation to our Homelessness Contract with Wyre Forest District Council - Bed & Breakfast and Private Lettings
- Telehealth Care Equipment and Services
- Minor Installation of Building Components
- Construction Services and Grounds Maintenance Services

Action Plan - Year 3 (1st April 2017 to 31st March 2018)

Risk mitigation, we have:

- Continued to build on our strategy and framework for tackling Modern Slavery developed in 2015/2016, by setting annual action plans.
- Completed annual reviews of our training programme and induction for new employees ensuring modules on modern slavery and human trafficking including how to identify and report it are up to date and mandatory .
- Reviewed our policy framework taking into account any implications for modern slavery. In particular we have reviewed policies on safeguarding and whistleblowing during the year and increased awareness and understanding of them across the business.
- Carried out a complete review of our websites in consultation with customers and ensured that there is a continued focus on modern slavery with useful information to support colleagues, customers, suppliers and partners, and details of our expectations of those who want to work with us www.communityhg.com
- Updated our Procurement Strategy and policy and associated procedures which set out our expectations of contractors and supplies in relation to compliance with the Law and our requirements (further information is available on our website).

- Responded promptly to any changes in legislation.
- Continued to comply with guidance and best practice.

Action Plan - Year 4 (1st April 2018 to 31st March 2019)

Through our ongoing commitment we will strive to ensure that there is no slavery or human trafficking in our business, partnerships or our supply chains.

We will continue to:

- Update our training programme and induction for all new employees
- Ensure all strategies, policies and procedures, take into account latest best practice guidance on combatting modern slavery
- Respond promptly to any changes to current legislation and any new or emerging legislation
- Continue to comply with guidance and best practice.
- Ensure evidence of compliance is available through our website and that key messages are communicated.
- Set annual targets based on our performance in the previous year
- Work with colleagues and partners to ensure a continued focus on modern slavery and human trafficking in the delivery of our new 3 year Business Plan to transform our organization into a modern, streamlined, digital business.

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



**Andy Ballard
Group Chair**

July 2018



**Ray Brookes
Group Chief Executive**

July 2018