

Rother DC Housing Company - Anti-Slavery and Human Trafficking Policy

1 Policy statement

- 1.1 This policy applies to all parts of Rother DC Housing Company (the **Company**).
- 1.2 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.3 The Company has a zero-tolerance approach to modern slavery.
- 1.4 We require all of our employees to be aware of the content of this policy and the possibility of modern slavery occurring within our business at any level or with any volunteers, interns, agents, contractors, external consultants, third-party representatives or business partners.
- 1.5 We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.6 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with any disclosure obligations under the Modern Slavery Act 2015 (the **Act**). The Act is designed to combat modern slavery in the UK and consolidates previous offences relating to trafficking and slavery.
- 1.7 We expect the same high standards from all of our contractors, suppliers and other partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.8 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.9 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2 Responsibility for the policy

- 2.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2 Chief Operating Officer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and

auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

2.3 The contact details for Chief Operating Officer are:
RotherDCHousingCompany@rother.gov.uk

2.4 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

2.5 The Chief Operating Officer should immediately inform the Chair of the Board of any alleged breaches of the policy.

3 **Compliance with the policy**

3.1 You must ensure that you read, understand and comply with this policy.

3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.3 You must notify the Chief Operating Officer or raise it through our confidential whistleblowing procedures as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

3.5 You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with the Chief Operating Officer or the Chair of the Board, as appropriate or through the confidential whistleblowing procedures.

3.7 The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Chief Operating Officer or the Chair of the Board, as appropriate immediately. If the matter is not remedied, and you are an employee, you should raise it formally.

4 Communication and awareness of this policy

- 4.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.
- 4.2 Our zero tolerance approach to modern slavery in our business and supply chains must be communicated to all suppliers, contractors and partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5 Breaches of this policy

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2 The Company may terminate its relationship with other individuals and organisations working on our behalf if they breach this policy.

Anti-Slavery and Human Trafficking Policy dated: October 2022

Anti-Slavery and Human Trafficking Policy to be reviewed: August 2024

Signed: 

Dated: 7th August 2023

Richard Thomas, Chair of the Board
Rother DC Housing Company Ltd