



Anti-Slavery and Human Trafficking Statement 2019

Introduction

VIVID Housing Limited, our Group parent, is a charitable registered society under the Co-operative and Community Benefit Societies Act 2014; it is also a registered provider of social housing with the Regulator of Social Housing.

Our group structure consists of VIVID Housing Limited, VIVID Build Limited (subsidiary), Vestal Developments Limited (subsidiary) and Aspect Building Communities Limited (joint venture).

Our Modern Slavery Statement applies to the whole Group.

We're committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains in accordance with the Modern Slavery Act 2015.

Our structure, business and supply chains

We're a housing association providing homes and services within local communities. We have approximately 850 staff. We manage and maintain around 30,000 affordable homes for rent or purchase. We're planning to develop around 1,200 new homes in 2019/20.

Our supply chain includes material suppliers for property maintenance, house building and supporting services.

What we did in 2018/2019

Current suppliers, contractors and business partners

We started the process of combining and rationalising the two sets of suppliers from legacy organisations and are in the process of collecting initial supplier assurance that they're complying with the Modern Slavery Act 2015.

Safeguarding

We implemented refreshed safeguarding policies in April 2018 which address modern slavery.

What we will do in 2019/20

Prevention

We will:

- continue to monitor, assess and manage risks associated with slavery and human trafficking, encouraging reporting through our speak up policy
- make all relevant pre-employment checks prior to employing staff
- obligate suppliers to complete an annual return confirming that they're complying with the Modern Slavery Act 2015 and terminate their status as an active supplier if they fail to do so
- subject all future transactions and tender activities to the legislation and reflect our commitment to acting ethically and with integrity
- keep our safeguarding policies up-to-date and ensure they continue to address modern slavery
- communicate with staff explaining the implications of the Modern Slavery Act and what they should do to recognise and report potential incidences
- publish this annual statement prominently on our website evidencing the actions that have been taken to reduce the risk of slavery and human trafficking from our business and supply chain

Reporting and handling of breaches

We will:

- encourage reporting of serious concerns related to our own activities or supply chain and take appropriate action
- report all attempted or actual breaches and their outcomes to the Audit & Risk Committee and Board.

The Executive Team shall:

- have primary responsibility for implementing this statement, monitoring its use and effectiveness
- ensure internal control systems and procedures are effective in countering modern slavery.

Author	Owner	Date approved	Review date
Melanie Arstall	Duncan Brown		