



Anti-Slavery and Human Trafficking Statement 2020-21

Introduction

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

Our group structure comprises VIVID Housing Limited (parent), VIVID Build Limited (subsidiary), Vestal Developments Limited (subsidiary), Bargate Homes Limited (subsidiary) and Aspect Building Communities Limited (joint venture).

Our Modern Slavery Statement applies to the Group, with the exception of Bargate Homes Limited who maintain their own statement, which is available on their website.

This statement was approved by the VIVID Board on 17th September 2020. Our financial year end date of 31st March 2020.

Our business and supply chains

We provide services and support to 72,000 customers in over 31,000 homes. Our homes are available across all tenures and types, from social rent to private market sale, tailored to the needs and demands of each area. To help more people find a place to call home we've set an ambitious target to build 17,000 homes over the next 10 years. We have approximately 850 staff.

VIVID Build Limited (subsidiary) provides development services to VIVID Housing Limited.

Vestal Developments Limited (subsidiary) builds homes for outright sale.

Bargate Homes Limited (subsidiary) builds homes for outright sale and whilst owned by VIVID operates independently.

Aspect Building Communities Limited (joint venture) is a joint venture in which VIVID has a 26% share. Development is undertaken through an LLP which owns the assets.

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

Definitions

Modern slavery is defined as recruitment, movement, harbouring or receiving of humans using force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation.

Human trafficking is the trade of humans for the purpose of forced labour, sexual slavery, or commercial sexual exploitation.

How we may encounter modern slavery and human trafficking

Procurement and supply chain are the areas of our business most likely to encounter modern slavery or human trafficking.

Modern slavery or human trafficking could also be encountered in our work to support of vulnerable customers, and in the homes we provide.

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 are not taking place in any part of our business or anywhere in our supply chains in accordance with the Modern Slavery Act 2015.

What we did in 2019-20

- We continued to monitor, assess and manage risks associated with modern slavery and human trafficking, encouraging reporting of concerns related to our own activities or supply chain through our speak up policy
- We made all relevant pre employment checks
- We collected assurance from our suppliers that they comply with the Modern Slavery Act 2015, reserving the right to terminate their status as an active supplier if they failed to do so. All suppliers confirmed these requirements had been met or confirmed exemption from the Modern Slavery Act 2015.
- We updated our safeguarding policies which address modern slavery
- We communicated with staff explaining the implications of the Modern Slavery Act and what they should do to recognise and report potential incidences
- We published our 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

What we will do in 2020-21

We'll continue to undertake all the activities we carried out during 2019-20.

We'll obligate our suppliers to complete an annual return confirming they're compliant with the Modern Slavery Act and will terminate their status as an active supplier if they fail to do so.

We'll report all attempted or actual breaches and their outcomes to the Audit & Risk Committee and Board (there were none for 2019-20).

Our Executive team will continue to have primary responsibility for implementing this statement, monitoring its use and effectiveness, ensuring our internal control systems and procedures are effective in countering modern slavery and human trafficking.

Author	Owner	Date approved	Review date
Melanie Arstall	Duncan Brown	Sep-2020	Sep-2021