



Anti-Slavery and Human Trafficking Statement 2021-2022

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 Modern Slavery Statement applies to the Group, apart from Bargate Homes Limited, who maintain their own statement, which is available on their website.

This statement was approved by the VIVID Board on 16 September 2021. Our financial year end date is 31st March.

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.

Our group structure comprises:

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.

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

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

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

VIVID Housing Limited (parent)

VIVID Plus Limited (subsidiary) is used for activities that support VIVID's Community Investment Strategy. Its charitable purpose is to create and support long term sustainable communities by improving the prospects and opportunities of customers living in those communities.

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 chains linked to house building and property maintenance are the areas of our business most likely to encounter modern slavery or human trafficking due to suppliers' improper procurement practices.

Modern slavery or human trafficking could also be encountered in our work to support vulnerable customers in particular those from minority or socially excluded groups who may be subject to forced labour and/or domestic servitude. The accommodation we provide could also be a potential venue for modern slavery.

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.

Suspicious activity can be reported through our speak up policy/ procedure.

What we're doing in 2021

- We monitor, assess and manage risks associated with modern slavery and human trafficking, encouraging reporting of concerns related to our own activities or our supply chain through our speak up policy;
- We make all relevant pre-employment checks;
- We meet and, where we can, exceed minimum wage requirements;
- We collect assurance from our suppliers that they comply with the Modern Slavery Act 2015 or are exempt, reserving the right to terminate their status as an active supplier if they fail to do so. As at 20th July 45% of our contractors had confirmed full compliance;
- We update our safeguarding policies which address modern slavery;
- We communicate our Anti-Slavery and Human Trafficking Statement to all staff;
- We publish our annual statement prominently on our website and on the governments online register evidencing the actions that have been taken to reduce the risk of slavery and human trafficking from our business and supply chain;
- We are a housing partner in the Hampshire modern slavery partnership (victim support group) which provides information on modern slavery such as information about modern slavery cases in Hampshire, trends, which industries are prone to modern slavery and expectations of support for victims;
- We actively take part in the National Safeguarding Week;
- We report attempted or actual breaches and their outcomes to the Audit & Risk Committee and Board;
- Our Executive team 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.

What we plan for 2022

We'll continue to undertake all the activities we carry out during 2021 and in addition will be aiming to:

- Explore performance indicators to measure our effectiveness in ensuring that slavery and human trafficking is not taking place in our business or supply chains;
- Improve visibility of our suppliers' full supply chains by examining, for example, ISO accreditations which provide transparency regarding how suppliers monitor their 3rd party operations;

- Investigate supporting our suppliers with training through roadshows, online training, etc;
- Develop staff training to facilitate understanding of the implications of the Modern Slavery Act and what they should do to recognise and report potential incidences ensuring that 95% of staff complete any mandatory training (to take account of paternity leave or long-term sickness).

Owner	Approved by	Date approved	Review date
Duncan Brown	Board	16 September 2021	September 2022