Modern Slavery Act compliance statement

1 April 2023 – 31 March 2024

Introduction

Livv Housing Group is committed to preventing, identifying and reporting modern slavery and human trafficking in our business, communities and supply chains. We do this through:

- our procurement activities,
- our employment practices, and
- our role as a social housing provider, informing relevant authorities of any suspected modern slavery or human trafficking in our communities.

This statement sets out how we seek to prevent modern slavery. It is made pursuant to Section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015 and is Livv Housing Group's slavery and human trafficking statement for the financial year 1 April 2023 to 31 March 2024.

Structure and supply chains

Livv Housing Group (the Group) is a charitable registered society under the Co-operative and Community Benefit Society Act 2014 and is a provider of social housing and related services registered with the Regulator of Social Housing.

We own and manage around 13,000 homes across Knowsley and the wider Liverpool City Region. We're committed to providing safe and warm homes while achieving positive impact and flourishing communities. Our main objective is to work alongside our customers and local, regional, and national partners to be the provider of choice for great homes and much more.

We do this through our structure, which is outlined below.



We employ 495 people (as of 31 March 2024). We carry out the majority of our property repair and facilities management services in-house, through Livv maintenance.

To achieve our business aims we procure goods, works and services from other organisations. We spent £76.4m including VAT in the financial year 2023-2024 through procurement.

We have a diverse supply chain including:

- Property contractors (housing development, repairs and maintenance)
- Corporate goods (IT, recruitment services and training)
- Marketing and Communications
- Office supplies

The majority of our suppliers are registered in the UK but some of their operations and supply chains are global.

We recognise our responsibility to take a robust approach to identifying and preventing slavery and human trafficking. We're also committed to ensuring there is transparency in our own business and our approach to tackling modern slavery is consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect our contractors, suppliers and business partners to share the same high standards.

Policies on modern slavery

The Group has a Policy and Strategy Framework which is approved by the Board.

The following strategy and policies comprise our approach to identifying modern slavery risks and preventing slavery and human trafficking in our operations.

We review our policies at least every three years to make sure that they reflect the Group's aims and our regulatory and statutory obligations.

- Procurement Policy and Strategy

Our Procurement Policy sets rules and principles for procurement and contract management which enable us to manage contract risk. All employees engaged in managing or leading contracts for goods or services must also adhere to our contract management framework. We have controls in place to ensure that goods and services are procured in compliance with Modern Slavery legislation. Through our Procurement Strategy we aim to continually improve our approach to procurement.

- Whistleblowing Policy

We encourage all employees, customers and other business partners to report any concerns related to any direct activities or the supply chains of the Group. Our Whistleblowing Policy is designed to make it easy for employees to make disclosures without fear of retaliation.

- Colleague Code of Conduct

We make clear to employees the actions and behaviour expected of them when working for or representing the Group. We strive to maintain the highest standards of employee conduct and ethical behaviour when managing our supply chain.

- Colleague Selection Policy

We carry out Right to Work checks for all new employees. We have a Preferred Supplier List for recruitment and agency workers. We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from that agency.

- Safeguarding Policy

We seek to tackle modern slavery in our communities in our role as a social housing provider. All employees, agency workers and contractors are responsible for sharing information and raising alerts where there is a concern of modern slavery. Customers are also able to report to us any suspicions they may have regarding potential instances of modern slavery.

We are a member of Knowsley's Multi-Agency Safeguarding Hub (MASH). We report any suspicions of modern slavery taking place in Knowsley through the Hub, who will investigate further. The Hub has members authorised to make referrals to the National Referral Mechanism (NRM). The NRM is a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support. We also report potential modern slavery cases to the safeguarding hubs of other local authority areas we own homes in.

- Risk Management Policy

Our Risk Management Framework, including our Risk Management Policy, ensures we have a consistent approach to risk management and assurance. The policy identifies and assigns responsibilities in relation to risk management, control and assurance. We carry out an annual modern slavery risk assessment.

Due Diligence processes

The Group will only trade with suppliers who fully comply with the Modern Slavery Act or are taking the necessary steps towards compliance.

We undertake due diligence when we take on new suppliers and procure new contracts. Our procurement procedures require potential suppliers to declare whether they comply with the Modern Slavery Act. If they are not compliant, they are required to explain why. We will reject any bids which state they are not compliant and fail to provide sufficient detail of their proposed reasonable measures to achieve compliance.

Our Standard Terms and Conditions of Purchase for suppliers include a requirement to comply with the Modern Slavery Act.

We have enhanced our central contracts register and our contract management framework, which ensures consistency across Livv and allows contracts to be managed and actioned accordingly. Contract managers are required to maintain and review contract records including evidence of supplier policies and procedures. We carry out contract monitoring reviews on a sample basis.

Assessing the Risk

The Group has completed a risk assessment for 2024-25 which has identified the Group is at low risk of slavery and human trafficking within our operations. This is based on an assessment of a range of controls and assurances to manage the risks, an assessment of the country and sector we operate in, and the transaction and business partnership arrangements we have in place.

Potential risks are mitigated by our policies and procedures, controls built into our business operations and the knowledge, skills and behaviours of our employees.

We maintain a range of risk registers which reference the risk and related controls of modern slavery.

Training

The Group requires all employees to complete a compulsory online training course on modern slavery as part of their induction. Further compulsory training for all employees is carried out every three years. We also seek to maintain ongoing awareness through compulsory training for all employees on safeguarding.

We have strengthened modern slavery content in our tailored safeguarding training for housing management employees. In 2023-24 all of our customer-facing repairs and maintenance employees received this training too.

We have trained relevant staff on how to monitor the risk of modern slavery through contract management.

For the International Day for Abolition of Slavery on 2 December 2023, we provided information reminding colleagues how to check that prospective suppliers comply with the Modern Slavery Act and how to spot the signs of, and report, modern slavery in our communities. We also provided information to our customers through our social media channels.

Performance and Future Plans

We are pleased to state that no incidents of modern slavery in our operations have been reported during this period.

We will continue to work and communicate with our suppliers, partners and employees to maintain our robust processes on modern slavery and, where possible, enhance them.

We will complete three-year reviews of our Procurement Policy and Procurement Strategy in Autumn 2024. As part of our transition to the Procurement Act 2023 and Procurement Regulations 2024 activity we will be reviewing our procurement arrangements including circumstances for exclusion related to non-compliance with Modern Slavery expectations. We will be rolling out a programme of training and communication to employees and suppliers as part of this transition.

Approval

This statement was approved by Livv Common Board on 25 July 2024.

Signed:

Philip Raw
Chair of Livv Common Board
25 July 2024