

Modern Slavery Act compliance statement

1 April 2024 – 31 March 2025

Introduction

Livv Housing Group is committed to preventing, identifying and reporting modern slavery and human trafficking in our business, supply chains and communities. 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 2024 to 31 March 2025.

Structure and supply chains

Livv Housing Group (the Group) is a charitable registered society under the Co-operative and Community Benefit Societies 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 are committed to providing safe and warm homes whilst making a positive impact and helping our communities to flourish. Our main objective is to work alongside our customers and local, regional, and national partners to be the provider of choice for great homes, support and services.

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



We employ 536 people (as of 31 March 2025). 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 £85.5m including VAT in the financial year 2024-2025 through procurement.

We have a diverse supply chain including:

- Property contractors (housing development, repairs and maintenance)
- Corporate goods and services (IT, recruitment 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 only conduct business in Sterling.

We recognise our responsibility to take a robust approach to identifying and preventing slavery and human trafficking. We are committed to ensuring there is transparency in our own business and that 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. Our policies apply to Livv Housing Group, and to its subsidiary organisations as appropriate. 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. All of our policies set out specific responsibilities by role and have a named owner responsible for overall implementation, enforcement and monitoring. Policy documents are available to all employees on our intranet.

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

- Financial Crime Policy

Our Financial Crime Policy confirms the Group's anti-financial crime position and sets out the control framework that is in place to mitigate financial crime. All allegations of financial crime, including allegations of modern slavery, are investigated and reported. For the year 2024-25, there were no allegations of modern slavery reportable. We complete an annual financial crime risk assessment including modern slavery. The risk of financial crime and modern slavery are assessed as low.

- Procurement Policy and Strategy

Our Procurement Policy sets the rules and principles for procurement. 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 make sure that goods and services are procured in compliance with Modern Slavery legislation. Above and below threshold procurement activity require bidders to provide confirmation and information on Modern Slavery Act compliance.

In 2024-25 we reviewed our Procurement Policy and procedures to align with the Procurement Act 2023 and related Procurement Regulations 2024, which came into force on 24 February 2025. This included a comprehensive training and communication programme for colleagues and suppliers.

Our Procurement Strategy includes building trust in our supply chains through supplier relationship management and market engagement. The Group has been enhancing supply chain and contract management controls by driving maturity in our procurement practices and understanding risk in our supply chains. This includes maintaining embedded compliance principles and oversight throughout the contract lifecycle from procurement to contract expiry. Our procurement advisor Cirrus Purchasing, supports us in embedding compliant practices in line with our policy and procedures.

- Whistleblowing Policy

We encourage all employees, customers and other business partners to report any concerns related to our activities or supply chains. We maintain a whistleblowing register which is overseen by our Audit and Risk Committee. Our Whistleblowing Policy sets out the Group's commitment to employees who make disclosures that they can do so without fear of retaliation. We will carry out a scheduled review of the Whistleblowing Policy in 2025.

- Colleague Code of Conduct

Our code provides a clear framework for how we expect Livv employees to conduct themselves. We strive to maintain a work environment in which honesty, integrity and respect for colleagues, customers and clients are constantly reflected in personal behaviour and standards of conduct.

- 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.

- **Grievance Policy**

We aim to ensure that colleagues are treated in the same way in similar circumstances and issues are dealt with fairly and reasonably. Employees are able to raise a grievance if they are concerned with the way in which they have been treated by the business, managers or colleagues. Our Grievance Policy is consistent with the ACAS code of practice on grievance procedures.

- **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. Our mobile IT system allows employees to report welfare concerns in real-time, which are triaged by managers and the Safeguarding Team. 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.

We participate in the Northwest Housing Safeguarding Group to collaborate with other social housing providers and share best practice. We also attend weekly Threat, Harm, Risk meetings with Merseyside Police, focusing on serious organised crime, cuckooing, and county lines.

We reviewed our Safeguarding Policy in 2025. The updated policy reinforces our commitment to work with partners to prevent harm, promote dignity, and safeguard the wellbeing of both adults and children in our communities. It outlines clear roles and responsibilities for colleagues, contractors, and partners; embeds the principles of professional curiosity; and sets expectations for recognising, reporting, and responding to concerns. The policy also formalises our information-sharing responsibilities, sets clear thresholds for intervention, and establishes expectations for regular training, auditing, and review. Together, these enhancements ensure safeguarding is fully embedded in day-to-day service delivery and governance.

Our Board receives a six monthly safeguarding update report.

- **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 aligned to our governance and delegated authority arrangements.

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.

Our contract management framework and central contracts register ensure consistency across Livv and allow 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.

Work to enhance understanding of risk in our supply chains in 2024-25 has enabled a greater focus on due diligence both prior to contract award and throughout the contract lifecycle. Whilst activity to date has focussed on our higher risk supply chains, there are plans to continue this activity to embed supply chain risk management across the Group.

Assessing the Risk

Our 2025-2026 modern slavery risk assessment identifies 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 these risk exposures, 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 have identified strategic and operational risk and related controls and assurance measures including those relating to modern slavery. The Strategic Risk Register includes Legal and Regulatory Compliance risk (SR16) to maintain strategic performance in alignment with relevant law, regulation and organisational obligations including maintaining relevant strategic stakeholder relationships. Modern slavery risk is also reflected in our Finance Risk Register (FIN06 – Fraud). Related controls and assurance measures are reviewed on an at least quarterly basis.

The Board, Audit and Risk Committee, Executive and Management frequently review risk exposure, controls and assurance activity along with how this aligns to defined

risk appetite and tolerance measures. The Board approve and monitor actions where risks may require closer alignment to risk appetite.

The Group has a rolling programme of internal audit activity covering all areas of our operations. An internal audit review of procurement and contract management is planned for 2025-26.

Training

The Group requires all employees to complete compulsory training on modern slavery as part of their induction. We carry out further compulsory online training for all employees every three years. This last took place in 2024 with 97% of colleagues completing the training and action ongoing to address non-completion by the remaining employees.

We also seek to maintain ongoing awareness through compulsory training for all employees on safeguarding. All employees complete annual training on safeguarding adults, while customer facing teams receive in-person Level 2 training delivered by our Safeguarding Advisor.

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 enhance our understanding of risk in our supply chains, including working with our suppliers, partners and employees to maintain our robust processes on modern slavery and, where possible, enhance them.

We will continue with our programme of supply chain workshops with teams in 2025-26 including embedding tools for contract owners on managing supplier relationships. We will consider automation and how improved systemisation of supplier relationship management activity can bring benefits.

We will confirm contract management requirements for colleagues on maintaining evidence of modern slavery compliance throughout the contract life cycle.

In 2025 we are starting a programme of annual visits to all customers' homes during which we will assess wellbeing, home condition, and support needs. This will provide further opportunities to identify any cases of modern slavery taking place in our communities.

The Government recently updated its Transparency in Supply Chains guidance (24 March 2025). We will review the new guidance in alignment with current controls to make sure our arrangements reflect the latest statutory guidance.

Approval

This statement was approved by Livv Common Board on 24 July 2025.

Signed:

Philip Raw
Chair of Livv Common Board
24 July 2025