

Modern Slavery Act compliance statement

1 April 2025 – 31 March 2026

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.

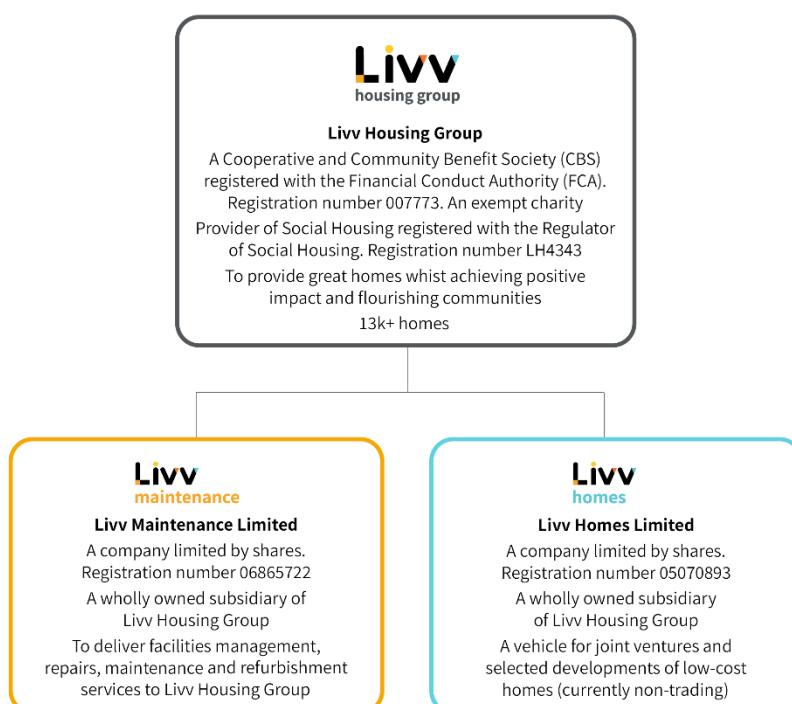
This statement sets out how we seek to prevent modern slavery. It is made pursuant to Section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015 and is Livv Housing Group's modern slavery statement for the financial year 1 April 2025 to 31 March 2026.

Structure and supply chains

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

We own and manage around 13,000 homes across Knowsley and the wider Liverpool City Region. We're committed to providing safe, quality affordable homes, delivering great services and helping local people to live well.

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



We employ 529 people (as of 31 March 2026). 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 £65.9m including VAT in the financial year 2025-2026 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 and zero tolerance approach to slavery and human trafficking. We are also 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 our subsidiary organisations as appropriate. We review policies at least every three years to make sure that they continue to reflect the Group's aims and our regulatory and statutory obligations.

All 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. We also publish relevant policies on our website so that they are accessible to customers and to suppliers.

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. 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 our rules and principles for procurement. All staff 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.

Our procurement advisor, Cirrus Purchasing, supports us in embedding compliant practices in line with our policy and procedures. During 2025-26 we continued our comprehensive Procurement Act 2023 training and communication programme for staff and suppliers.

Our Procurement Strategy 2025-28 includes actions to build trust in our supply chains through supplier relationship management and market engagement. We are 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.

We have supply chain management protocols in place for new housing development. In 2025-26 we reviewed and refreshed supply chain management protocols for Livv Maintenance and for IT services. We have defined the Livv Maintenance supply chain, rolled out contract management expectations and put in place active relationship management. We have also started work to refresh our asset management supply chain protocols.

- [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 reviewed our Whistleblowing Policy in 2025 and 2026 to confirm ongoing compliance with legal requirements and good practice.

- 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. We will complete a scheduled review of the Colleague Selection Policy in 2026 to ensure it remains effective.

- 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. Our Safeguarding 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 staff members, contractors and partners, embeds the principles of professional curiosity, and sets expectations for recognising, reporting, and responding to concerns. Our Board receives a six-monthly safeguarding update report.

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.

In 2025-26 we started a programme of annual visits to all customers' homes during which we assess wellbeing, home condition, and support needs. This provides further opportunities to identify any cases of modern slavery taking place in our communities.

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.

All Community Safety Advisors now also have access to Knowsley MBC's Early Help Module (EHM) enabling direct referrals to KMBC specialist teams, supporting timelier escalation and improved information sharing. In 2025-2026 we provided Early Help training to customer facing staff, supporting earlier identification of need and clearer referral pathways into partner services. 95 staff members in our communities team also took part in a professional curiosity workshop delivered by Knowsley Metropolitan Borough Council which will help them identify modern slavery risks.

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.

In 2025-2026 we implemented a central and accessible source of safeguarding guidance resources and updates for staff and recruited internal Safeguarding Champions to strengthen local safeguarding leadership and peer support. We will carry out knowledge gap surveys to inform the design and delivery of targeted training programmes.

- 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 2025-26 has enabled a greater focus on due diligence both prior to contract award and throughout the contract lifecycle.

We have carried out a review of the recommendations in the Government's updated Transparency in Supply Chains Guidance (March 2025) which has informed our risk assessment and preparation of this statement, and the identification of future improvement actions.

Assessing the Risk

Our 2026 modern slavery risk assessment found that the Group is at low risk of slavery and human trafficking within our operations. The assessment was made by reviewing our operating and internal control environment, including the sector we work in, our governance and procurement arrangements, incident reporting mechanisms, and training and support for staff to report concerns and indications in modern slavery identify during service delivery.

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 and Executive Directors Team regularly 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 took place in March 2026. It reached a Medium risk conclusion, and we will take action on the recommendations in 2026-27. None of the identified actions related to Modern Slavery.

Training

The Group requires all employees to complete compulsory online training on modern slavery as part of their induction. We carry out further compulsory online training for all employees every three years. 97% of colleagues have completed the training with 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.

In 2026-27 we will continue our programme of work to improve the Group's procurement maturity and Procurement Act 2023 compliance related controls. This will help teams to identify their supply chains, strengthening our controls around modern slavery compliance.

Approval

This statement was approved by Livv Common Board on 30 July 2026.

Signed:

Philip Raw
Chair of Livv Common Board
30 July 2026