



# Anti-slavery and human trafficking transparency statement 2022/23

## Introduction

We are committed to ensuring as far as possible that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing effective controls to ensure such exploitation is not taking place.

## Our structure, business, and supply chains

Livin Housing Limited is registered with the Regulator of Social Housing and is the parent company of Livin Developments Limited. This Statement covers Livin Housing Limited and all subsidiaries.

We are a local housing provider currently managing over 8,600 homes in the County Durham area. We aim to improve lives through sustainable homes and places. As a charitable, highly regulated organisation, we conduct our business in a responsible and ethical way.

Our supply chains include goods, works and services for the construction and repair of residential properties (industries in which the Government has identified as higher risk of modern slavery), and standard business goods and services such as IT equipment (minimal risk).

## Our policies and procedures in relation to slavery and human trafficking

We have in place a robust framework of policies and procedures that contribute towards the prevention of slavery or human trafficking within our day-to-day operations and our supply chains and are regularly updated. These include:

- Recruitment and Selection processes
- Employee Code of Conduct
- Probity Policy
- Equality, Diversity, and Inclusion Policy
- Health and Safety Policy
- Whistleblowing Procedure
- Risk management Policy and Strategy
- Anti-social Behaviour Policy
- Safeguarding Policy
- Procurement Policy
- Contract and Procurement Rules
- Anti-Bribery Policy
- Anti-Fraud and Corruption Policy
- Anti-Money Laundering Policy.

## Our due diligence and risk assessment processes for slavery and human trafficking

To minimise the risk of recruiting employees who may have been subject to human trafficking, every successful applicant must, prior to starting work, confirm proof of eligibility to work in the UK, successfully complete all necessary background checks and provide two acceptable references, including current or most recent employer.

Potential risks of trafficking, slavery, servitude or forced or compulsory labour within our communities or properties would be assessed and where appropriate escalated to relevant agencies through our Safeguarding Policy and associated procedures as employees conduct day-to-day business, which include planned periodic visits to every property and ad hoc visits as required.

Our approach to building and managing our supply chains is set out in detail in our Procurement Policy. To minimise the risk of modern slavery or human trafficking in our supply chains, we:

- require potential suppliers to declare that they are not involved in modern slavery or human trafficking and have not been subject to any investigation in connection with any offence involving slavery or human trafficking – with a mandatory exclusion for those that have been convicted of child labour or human trafficking anywhere in the world during the past five years (including any person in a position of control within the company);
- include provisions in our standard contract documentation requiring our suppliers to take appropriate steps to ensure that there is no slavery or human trafficking in their supply chains; and
- regularly review our procurement policies regarding tenders and contracts to ensure they reflect best practice and mitigate against the risk of modern slavery.

We use external advisers to support us with major procurement processes in both our building and repairs and maintenance services, and to monitor contract performance on an ongoing basis.

Our largest suppliers are themselves required to take steps to ensure compliance with the Modern Slavery Act 2015 and publish annual transparency statements.

### **Our effectiveness in combating slavery and human trafficking**

We work closely with a small number of key suppliers, and therefore our approach to combating modern slavery in our supply chain following procurement is through contract monitoring and maintaining strong working relationships with our suppliers.

We encourage reporting of any concerns of illegality through our line management structures or through our Whistleblowing Procedure, which allows anonymous reporting. No concerns in relation to modern slavery have ever been raised.

Given that responsibility for supporting with procurement sits with a single team and taking into consideration the small number of procurements undertaken by Livin, additional KPI monitoring is not considered appropriate.

### **Training**

We utilise external support on large-scale tenders to ensure that all risks, including the risk of modern slavery, are identified, and appropriately mitigated. Our relevant employees are regularly trained in safeguarding, including modern slavery and human trafficking.

### **Declaration**

This statement has been approved by the Group Board and is made pursuant to section 54(1) of the Modern Slavery Act 2015, constituting the Group's modern slavery and human trafficking statement for the financial year ending 31 March 2022.

**Dennis Bradley**

**Chair of Board**

**Date: 21 September 2023**

**Alan Boddy**

**Chief Executive**

**Date: 21 September 2023**