



Modern Slavery Statement 2024-25

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.

This 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 19 September 2024. Our financial year end date is 31st March.

Our business and supply chains

We're a leading provider of affordable homes and extensive support services in the south of England, with around 74,000 customers, 35,000 homes and 900 employees. Our vision is "more homes, bright futures" and our mission is to give customers a safe and secure home and provide the foundations for their wellbeing by:

- Delivering high-quality services so people can live independently in a safe and secure home and be proud of where they live
- Being here when things become difficult and working with customers to help get them back on track
- Building and providing more high-quality homes. We're determined to give as many people as possible the greatest chance of having a place to call home. We're the sixth largest developer of new homes amongst housing associations in England, having built over 1,524 last year.
- And our charitable arm VIVID Plus provides targeted support for customers and investment to local communities to help them thrive

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 a Limited Liability Partnership (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 and deliver 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.

Peninsular Capital plc (subsidiary) is our company which has been set up to transact our EMTN programme

Our supply chain includes material and service suppliers for property maintenance, house building and supporting services.

Definitions

Modern slavery is defined as “the recruitment, movement, harbouring or receiving of humans using force, coercion, abuse of vulnerability, deception, or other means for the purpose of exploitation”. (www.gov.uk)

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

The majority of cases of slavery will involve some form of housing issue. The accommodation we provide could be a potential venue for modern slavery.

Construction is one of the sectors most associated with being at risk to Modern Slavery and exploitation in the building industry in the UK is on the rise. Procurement and supply chains linked to construction and property maintenance are the areas of our business most likely to encounter modern slavery or human trafficking.

Modern slavery or human trafficking could also be encountered in our work to support vulnerable customers, particularly those from minority or socially excluded groups, who may be subject to forced labour and/or domestic servitude.

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, which is published internally and on our website. This is reviewed and rolled out to our staff annually. Any concerns about activities occurring in our properties can also be raised via our contact channels or directly with a member of staff

What we do

- 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 and we're an accredited Real Living Wage employer;
- We collect and record 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;
- We collect Modern Slavery Statements from contractors through TrackMyRisks;
- We receive regular legal updates so the most up to date guidance around preventing Modern Slavery within our procurement activities is noted and actioned accordingly;
- We update our safeguarding policies which address modern slavery. These are reviewed annually;
- We publish our annual statement prominently on our website evidencing the actions that have been taken to reduce the risk of slavery and human trafficking from our business and supply chain;

- We publish our annual statement on our internal intranet for staff;
- Publish our annual statement on the Government Modern Slavery Statement Register;
- We attend and contribute to the Housing sub-group of the Hampshire Safeguarding Adults Board, and where appropriate contribute to case reviews which may be about this subject matter;
- We have Modern Slavery training available on our Learning Hub for all staff to facilitate understanding of the implications of the Modern Slavery Act and what they should do to recognise and report potential incidences;
- 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 2024/2025

We'll continue to undertake all current activities and in addition will be aiming to:

- Raise awareness around the business of our statement and commitment to preventing Modern Slavery occurring in any part of our business or anywhere in our supply chains
- Encourage the completion of Modern Slavery training for all staff
- Create knowledge articles for staff and customers to refer to if they have suspicions or receive reports of modern slavery in our homes or business
- Continue to monitor the most up to date legal and legislative guidance around procurement practices
- Undertake a deep dive into our procurement processes and procedures
- Review our Tendering procedure to ensure all Modern Slavery checks are explicitly documented here in line with our template tender documents.
- Review and refresh our key policies relating to our commitment to the prevention of Modern Slavery including our Speak up Policy, Prevention of Financial Crime Policy and our Safeguarding Children and Safeguarding Vulnerable Adults policies.

Owner	Approved by	Date approved	Review date
Duncan Brown	Board	September 2024	September 2025