

# Modern Slavery Statement 2021 - 2022

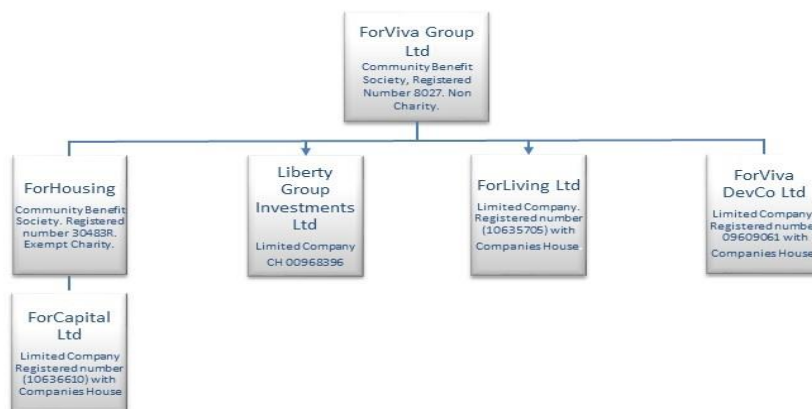
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This statement is made pursuant to s.54 of the Modern Slavery Act 2015 for financial year ending 2022 and sets out the steps that ForViva has taken and continues to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. ForViva has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain. We will not knowingly deal with any business involved in slavery or human trafficking.

## About ForViva

We are a social purpose business which operates within the UK that positively impacts communities by reinvesting profits, building vibrant and safe communities. We know that together we can achieve more so we work with a range of like-minded partners to deliver positive change in communities and improve lives. ForViva Group structure comprises of the following companies



The Group has noted the requirements of the Modern Slavery Act 2015 (the "Act"). This statement is made on behalf of the Group parent, ForViva, and the Group as a whole. The following subsidiaries in the Group are required to make their own statement under the Act and have adopted this statement.

- ForViva
- ForHousing
- ForLiving
- Liberty Group Investments Ltd

## In Our Business

Potential risks are mitigated by our policies and procedures, controls built into our business operations and the knowledge, skills and behaviours of our staff. Our documents that are relevant to slavery and human trafficking are:

- Anti Corruption and Bribery Policy
- Code of Conduct Policy
- Procurement Framework
- Recruitment and Selection Policy and Procedure
- Child and Adult at Risk Safeguarding Procedure
- Whistleblowing Policy
- Risk and Assurance Framework

We will continue to review and update relevant policies and procedures so that we take effective and proportionate steps to ensure there is no slavery and human trafficking in our business.

We have a robust internal audit plan in place reviewed on an annual basis which provides assurance across necessary areas of the Group.

In addition to the internal audit plan there is a robust management assurance framework across all operational areas ensuring policy and procedural compliance. The framework requires checks and balances to be completed to confirm compliance.

In 2020 we undertook and completed an independent review of procurement for ForHousing.

We also reviewed our Safeguarding Policy and Procedure and 2021 will see the launch of our new mandatory safeguarding training.

New employees are required to produce original documentation of their right to work in the UK on commencement of employment.

We recognise 4 trade unions and support their involvement in respect of employee rights.

We do not operate zero hours contracts and comply with the national living wage requirements.

## In Our Supply Chain

We engage with a wide variety of organisations for a broad range of goods and services which are primarily corporate, construction and property related.

Some of our suppliers subcontract work or rely on recruitment agencies to supply permanent or temporary staff. Whilst we consider that the risk in our supply chains is low, we recognise that no supply chain can be considered entirely risk-free.

Our tendering process ensures we engage with reputable contractors and suppliers who adhere to all appropriate legislation, regulation and practices.

We have not identified any breaches of the Act during 2020. We will continue to be vigilant and where a compliance breach is identified, we will act promptly, involve the appropriate lead agencies and feedback lessons learnt in order to minimise the risk of an incident occurring again.

In 2020 the Group looked to formally identify the risk of modern slavery to the Group and subsidiaries within tendering and contract management. We reviewed our New Supplier form and procurement risk registers. ForHousing's procurement risk register was reviewed and now includes a risk for modern slavery. Liberty Procurement risk register is under review with completion of review due in 2021.

So far in 2021 suppliers for ForHousing, ForViva Devco and Liberty, with an annual spend of over £50K were approached to complete a Modern Slavery Supplier Review form regarding their organisational policies or process.

The review form consisted of the 5 Modern Slavery questions that were included within the updated New Supplier Form in January 2021.

On the 1st April suppliers were contacted and responses requested before the 1st May 21.

- ForHousing received 32 responses out of the 86 supplier that were contacted
- ForViva Devco received 1 response from the 6 suppliers.
- Liberty Gas received 21 responses out of 75 suppliers.
- Liberty R&M received 16 responses out of 72 suppliers.

The review yielded a low response rate with only 29% of suppliers / contractors responding overall. We will follow this up throughout 2021 and analyse the reason for the low level of response and will ensure our suppliers and contractors are as committed as we are to implementing processes in relation to modern slavery.

This review will now take place annually for the highest spending suppliers and contractors in the group.

## Training and Awareness

We raised awareness of modern slavery and human trafficking through the publication of this statement on ForViva and subsidiary group websites.

We may also come across slavery and human trafficking in connection with tenants and customers we support. In addition we recognise our homes could be used for modern slavery.

We have a safeguarding procedure in place and deliver mandatory safeguard training to raise awareness of what slavery and human trafficking might look like and to encourage key tenant and customer facing staff to report concerns.

We will continue to raise awareness and deliver training to new and existing staff on Safeguarding.

In early 2021 we launched a new learning platform which includes mandatory governance training for all staff subjects include e-learning modules on modern slavery, whistleblowing, declaration of interest.

## Approval

This statement was approved by the Executive Management Board and signed on its behalf by:

Name: Mike Parkin, Chief Operating Officer

Signature:

A handwritten signature in black ink, appearing to read 'MP', is centered on a white rectangular background.

Date: 27.09.2021