# Trivallis.

# Modern Slavery Statement for financial year 2016/17

This statement is made in line with s.54 of the Modern Slavery Act 2015 and sets out the steps that Trivallis has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.





9513 HOMES
ARE AVAILABLE FOR
GENERAL HOUSING NEEDS



ARE SUPPORTED LIVING e.g. SHELTERED etc.



### Introduction

We at Trivallis recognise that modern slavery is not only a global issue but a local issue too with all aspects of slavery, servitude; forced labour and human trafficking that define modern slavery on the rise in Wales.

As an organisation that operates at the very heart of communities in Rhondda Cynon Taff, we make every effort to safeguard our tenants. Our zero tolerance approach to modern slavery extends to our supply chain.

We are committed to acting ethically and with integrity and transparency in all business dealings and we have effective systems and controls in place to ensure our suppliers operate to the same standards we expect of ourselves

#### Our business

Trivallis is one of Wales' largest social landlords. We provide homes and support for thousands of people living in Rhonda Cynon Taff and we partner with over 470 local businesses and suppliers.

Our vision is to be a trusted organisation that changes people's lives and communities for the better.

### **Our Tenants**

Our tenants are at the very heart of Trivallis and we work hard to ensure that they are safe and comfortable in their homes. From the very start of the tenancy we carry out eligibility and identification checks to ensure that our tenants have the means to sustain a healthy standard of living.

We also conduct follow up checks. Our safeguarding policy means we are aware and can respond to any signs of abuse and neglect.

Our staff continue to develop strong relationships with tenants and members of the local communities. They are in a good position to spot any signs that may suggest our tenants are at risk of modern slavery.

#### Our Staff

To enable our staff to perform at their best we invest in their training and wellbeing and provide a safe work environment.

We have made a commitment to pay the voluntary Living Wage, so that our employees can expect a decent standard of living. We check that all new employees have the right to work in the UK.

# Our high risk areas

The provision of social housing could be considered a target criteria for modern slavery. We are committed to doing as much as we can to keep our tenants safe.

We have an Audit, Risk and Finance Committee who regularly review any incidents, which are reported in a risk register. The register is live and current, providing the opportunity for proactive mitigation.

Any signposting of slavery in valleys picked up through media or police reports would be reported on the register and trigger an investigation into potential risk to both our tenants and staff.

# Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- 1. Anti-bribery and Corruption policy this ensures staff apply the highest standards of ethical conduct and integrity across our activities whilst maintaining Trivallis' reputation for conducting business honestly and professionally.
- Recruitment policy this includes conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- 3. Whistleblowing policy this enables all employees to raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisal.
- 4. The Board and Employee Code of Conduct policy this explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

# Our suppliers

Trivallis operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier.

This due diligence includes the answering of a detailed set of due-diligence questions to ensure that particular organisation has never been convicted of offences relating to modern slavery. Our approach to anti-slavery forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- 1. Their responses to the customer's slavery and human trafficking due diligence questions are complete and accurate;
- 2. Neither the contractor nor any of its officers, employees or other persons associated with it has been convicted of any offence

involving slavery and/or human trafficking and that they have not been or are not the subject of any investigation, inquiry or enforcement proceedings by any governmental, administrative or regulatory body regarding any offence or alleged offence.

- (The Supplier) shall implement due diligence procedures for its own suppliers, subcontractors and other participants in its supply chains, to ensure that there is no slavery or human trafficking in its supply chains.
- 4. They understand that we may terminate the contract at any time should any instances of modern slavery come to light.

# **Our Training**

Our community teams have been trained to recognise the signs of modern slavery and what to do if they suspect that it is taking place within our communities. We plan to extend this training to staff in other parts of Triavllis, which will raise awareness of the signs of modern slavery in our procurement and supply chains.

# Our performance indicators

We measure the effectiveness of the steps that we take to ensure that modern slavery and/or human trafficking is not taking place within our business or supply chain and look for evidence of:

 Zero reports received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

# Approval for this statement

This statement was approved by the Board of Directors on 20th July 2017



**Claire Jones**Trivallis Board Chair