

Trivallis.

Modern Slavery Statement for financial year 2022/23

This statement is made pursuant to 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.

 **10,194**
People dwelling

1,640
Garages 

 **56**
Commercial shops

 **633**
Lease Holders

Of these...

10,140

general needs properties

& 682

live in supported homes e.g. sheltered

WE 

partner with over
470 local
business and suppliers

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 take seriously our responsibility to be alert to the signs and take every effort to safeguard our tenants. Our zero-tolerance approach to modern slavery extends to our supply chain too, where we are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place ensure that our suppliers operate to the same standards we expect from our staff.

OUR BUSINESS

Trivallis is one of Wales' largest social landlords, operating within Rhondda Cynon Taff in South Wales, we provide homes for a range of tenants in the area from sheltered housing and flats through to large family homes. In order to deliver this work, we partner with around 350 local businesses and suppliers, and we also operate a number of tenant services that place our staff within the communities we serve.

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 conduct eligibility checks and ask for proof of identification and benefit checks to ensure that our tenants have the means to sustain a healthy standard of living. From here our safeguarding policy means we are aware and can deal with the signs of abuse and neglect.

We also conduct follow-up checks for new tenants, and our network of neighbourhood managers now work exclusively within designated patches across Rhondda Cynon Taff enabling them to develop vital local intelligence, so they can be our eyes and ears for any signs that our tenants may be at risk of entering into modern slavery.

OUR STAFF

At Trivallis our vision is to be trusted as an open and inspiring organisation that changes people's lives and communities for the better. In order to do this, we realise that we need to both invest in our staff and provide a safe environment for them to work.

This commitment starts from the recruitment stage where we check that potential employees have the right to work in the UK.

We have also made a voluntary commitment to pay the Living Wage, so that our employees can expect a decent standard of living.

PROUD TO BE HERE. Trivallis.

OUR HIGH-RISK AREAS

By its nature we consider the provision of social housing to be of high risk to being exploited for means of modern slavery and are keen to build local intelligence networks to ensure we can keep our tenants safe.

We operate an Assurance Committee and a keep a register upon which any incidents could be placed. This is always live and regularly updated, and any signposting of slavery in valleys picked up through media or police reports would trigger an item on the register for us to investigate further.

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 and maintains Trivallis' reputation and for conducting business honestly and professionally.
2. Recruitment policy - we operate a robust recruitment policy, including 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 - we operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. The Board and Employee Code of Conduct policy - this code explains the way we behave as an organisation and how we expect our employees and suppliers to act.

OUR SUPPLIERS

Trivallis operates a supplier policy and maintains an active supplier list. We conduct due diligence on all suppliers before allowing them to become an active supplier. This due diligence includes the answering of a detailed set of due-diligence questions to ensure the 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. There is also a responsibility for our suppliers to inform us of any issues they become aware of.

Suppliers must also demonstrate that they can meet Trivallis' minimum insurance levels and must have a positive credit rating score, via a

third-party agent. 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. That neither the contractor nor any of its officers, employees or other persons associated with it:
 - has been convicted of any offence involving slavery.
 - of human trafficking.
 - or in connection with slavery and human trafficking.
 - having made reasonable enquiries, has been or is the subject of any investigation, inquiry, or enforcement proceedings by any governmental, administrative, or regulatory body regarding any offence or alleged offence.
3. 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 become known.

OUR TRAINING

We have conducted training with our community teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our communities. We will be continuing our training with staff this year, which will raise awareness of the signs of modern slavery in our procurement and supply chains.

OUR PERFORMANCE INDICATORS

We will know the effectiveness of the steps that we are taking to ensure that modern slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are 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 20 July 2023

Nick Beckett
Trivallis Board Chair